

Scrutiny Streets & Environment Sub-Committee Agenda



To: Councillors Councillor Ria Patel (Chair), Councillor Louis Carserides (Vice-Chair), Danielle Denton, Gayle Gander, Stella Nabukeera, Ellily Ponnuthurai and Luke Shortland

Reserve Members: Leila Ben-Hassel, Adele Benson, Sherwan Chowdhury, Samir Dwesar, Simon Fox, Mohammed Islam and Esther Sutton

A meeting of the **Scrutiny Streets & Environment Sub-Committee** which you are hereby summoned to attend, will be held on **Tuesday, 11 July 2023 at 6.30 pm** in **Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX**

Katherine Kerswell
Chief Executive
London Borough of Croydon
Bernard Weatherill House
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Tom Downs
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www.croydon.gov.uk/meetings
Monday, 3 July 2023

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AGENDA – PART A

1. Apologies for Absence

To receive any apologies for absence from any members of the Committee.

2. Minutes of the Previous Meeting (Pages 5 - 42)

To approve the minutes of the meeting held on 14 March 2023 as an accurate record.

3. Disclosure of Interests

Members are invited to declare any disclosable pecuniary interests (DPIs) and other registrable and non-registrable interests they may have in relation to any item(s) of business on today's agenda.

4. Urgent Business (if any)

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

5. Period 1 Financial Performance Report (Pages 43 - 58)

The Sub-Committee is asked to scrutinise the information provided with a view to considering whether it is reassured about the delivery of the 2023-24 Sustainable Communities, Regeneration & Economic Recovery Budget.

6. Cabinet Report: Parking Policy Transformation Project

To conduct pre-decision scrutiny on the Cabinet papers for the 26th July 2023 covering the Parking Policy Transformation Project. *(To Follow)*

7. Consultation on the Local Flood Risk Management Strategy (Pages 59 - 116)

To receive a presentation on the forthcoming consultation on updating the Council's Flood Risk Plan, so that the Sub-Committee can provide feedback and input into its development.

8. Cabinet Response to Scrutiny Recommendations (Pages 117 - 126)

The Streets & Environment Sub-Committee is presented with an up to date list of responses from Cabinet to recommendations made by the Sub-Committee for review.

9. Scrutiny Work Programme 2023-24 (Pages 127 - 134)

The Sub-Committee is asked to:

- a) Note the draft work programme for 2023-24, as set out in Appendix 1 of the report.
- b) Consider whether there are any changes to the work programme that should be considered.

10. Exclusion of the Press and Public

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

“That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended.”

PART B

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Public Document Pack Agenda Item 2

Scrutiny Streets & Environment Sub-Committee

Meeting held on Tuesday, 14 March 2023 at 6.30 pm in Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX

MINUTES

Present: Councillors Councillor Ria Patel (Chair), Councillor Amy Foster (Vice-Chair), Simon Brew, Danielle Denton, Christopher Herman, Mohammed Islam and Luke Shortland

Also Present: Councillor Scott Roche (Cabinet Member for Streets and Environment)
Councillor Jeet Bains (Cabinet Member for Planning and Regeneration)
Councillor Leila Ben-Hassel (Virtual)

Apologies: None.

PART A

8/23 **Apologies for Absence**

There were none.

9/23 **Minutes of the Previous Meeting**

The minutes of the meeting held on 31 January 2023 were agreed as an accurate record.

10/23 **Disclosure of Interests**

There were none.

11/23 **Urgent Business (if any)**

There were no items of urgent business.

12/23 **Waste, Recycling and Street Cleansing Contract Specification**

The Sub-Committee considered a report set out on pages 17 to 28 of the agenda, which provided an update on the Waste, Recycling and Street Cleansing Contract Specification. The Director of Sustainable Communities introduced the item and went through the presentation at Appendix A.

The Chair highlighted the 'Options Appraisal' and asked whether any options had been disregarded at this stage. The Director of Sustainable Communities explained that the only option that had been discounted was that of extending the current contract past 2025; delivery of services by in-house provision, re-procurement or Local Authority Trading Company were still on the table for consideration. The Chair asked if there had been consideration of delivering different elements of the service through a mix of these options and the Sub-Committee heard that this was still a possibility.

The Chair asked if officers were confident that the Council was within the timeline for delivering the possible options that had been set out, noting the need to account for the Greater London Authority (GLA) Collection Conformity assessment. The Sub-Committee heard that the GLA only looked at the collection element of the service and that the current provision already met the requirements of the GLA. Members heard that the GLA submission had already been undertaken, and that approval could take up to 108 days, which sat within the proposed timeline for the final officer recommendation to Cabinet. On the procurement pack, Members heard that officers were running activity for all options in parallel, and it was acknowledged that the timelines were tight but achievable. The Director of Sustainable Communities explained that, if it were decided to go out to the market, then conversations would be consolidated where possible. The aim was for any contract to be awarded by early 2024, if this was the option that was chosen, to ensure there were 12 months for a contractor to purchase vehicles and be ready to deliver services.

The Sub-Committee asked how it was possible to ensure that any Key Performance Indicators (KPIs) for the new contract would be achievable, and how these would compare to other similar boroughs. The Director for Sustainable Communities acknowledged that the KPIs in the current contract had been set at a level that was too ambitious when compared to neighbours. Members heard that benchmarking with other authorities would take place to inform the setting of KPIs for the new contract, as well as incorporating industry standards; realistic targets would be set, with ambitious stretch targets to incentivise good performance.

The Vice-Chair asked what outcomes were being sought as a part of the new contract, and whether these would be realistic given potential costs. The Director of Sustainable Communities explained that the report to the November 2022 Sub-Committee had included a breakdown of the indicative costs of the Options Appraisal, but that these would be sense checked for the final report to Cabinet; possible growth in this area had been highlighted in the Medium Term Financial Strategy. Members heard that there was a desire to maintain the current frequency of collections, which conformed to the standards set out by the Mayor of London, and to improve collections for flats above shops.

The Chair asked what could be done differently for collections for flats above shops and heard that the Council could consider a number of different approaches, such as a bag service or communal food collection points. The

Director for Sustainable Communities explained that the specification would recognise the ambition to provide an improved service in this area, but that it would be for bidders, should the contract go to market, to explain how this would be achieved by looking at national best practise.

The Sub-Committee asked how it was ensured that lapsed Garden Waste collection subscriptions were not still collected. Members heard that there was a process in place for this that started with a notification to the resident, then to the contractor, and culminated in the removal of the Garden Waste bin. The Sub-Committee asked about missed Garden Waste collections, and the possibility of extending the service for the number of weeks the collection had been missed. The Head of Environment Services & Sustainable Neighbourhoods explained that it was not currently possible to automate this kind of process, as it required a manual investigation by an officer, and an officer decision on whether there would be an extension. The Director of Sustainable Communities explained that any extension would be at the cost of the contractor, which was why due diligence was especially important. The Chair asked if officers were confident that all Garden Waste bins were being collected once contracts ended, and the Director of Sustainable Communities explained that the contractor was notified not to collect Garden Waste and to recover the bin. There were a number of reasons that bins might not be recovered, including theft and residents failing to present the bins for recovery.

Members asked what solutions would be considered for properties without the space to accommodate multiple wheelie bins. The Director of Sustainable Communities explained that this was already in place through a box collection for certain streets and areas in the Borough; this requirement would likely be continued in any new contract to ensure bins were not left on the street. The Cabinet Member for Streets & Environment explained that the quality of the boxes themselves could be looked at to ensure these were durable, with lids that were secure and not easily lost.

The Chair invited Councillor Ben-Hassel to ask a question relating to Environmental Enforcement. The Director of Sustainable Communities explained any option would consider how the service provider would deal with fly-tipping as a first contact to check whether there was any evidence that could lead to a Fixed Penalty Notice; this was a provision in the current contract. Members heard that evidence of this kind was relatively rare, but there were aspirations that the new specification sought a proactive approach to fly-tipping that was not just reactive to reports. Councillor Ben-Hassel asked if it had been considered that there be better join up between reporting and investigating systems for fly-tipping. The Director of Sustainable Communities explained that this was an aspiration for the future service and would be included in the method statement for this element.

Councillor Ben-Hassel asked if it had been considered if the contract could be broken up to be tackled by multiple specialist contractors and the Chair asked what outcomes had been seen from soft market testing. The Director of Sustainable Communities explained that the market had moved to a more risk

adverse approach due to market volatility, especially around the disposal of recyclates. Members were informed that guaranteed income was being considered for the new specification, alongside separating out disposal of recyclates from the main contract. The Sub-Committee heard that there was some nervousness around the decarbonisation of fleets, and that the Council needed to be careful about how electric or alternative fuel vehicles were considered for the future service.

The Chair asked how data sharing between contractor and Council systems would work for the future service. The Director for Sustainable Communities explained the current system had fully automated integration between the two systems that allowed for data analysis on fly-tipping hotspots and areas of repeated missed collections. Members heard that this would be continued in the future delivery of the service, but that consideration needed to be given as to what was required to tighten this up further.

The Director for Sustainable Communities explained that the Council owned the current Heavy Goods Vehicle (HGV) fleet, and had licensed them to the existing contractor. In response to questions about recruitment of HGV drivers in the context of shortages, Members heard that any prospective bidders for the contract would need to explain measures that would be used to address this, however, it was acknowledged that this was a national issue.

The Vice-Chair asked what collaboration was taking place with the Housing department on collections for estates. The Director of Sustainable Communities explained that they had recently attended the Tenants and Leaseholder Panel to speak about the Council's Housing Stock, and that it was understood that a Housing Waste Infrastructure review was needed to understand what had changed to ensure adequate bin provision; this would then feed into the future service delivery.

Members raised concerns about inflationary pressures on wages that had come close to causing industrial disputes under the current contract. The Director of Sustainable Communities explained that indexation and inflation would be important aspects of any new contract that these elements would be up to date with best industry practice. Members heard that cost of delivering the service was discussed during annual reviews under the current contract, which could lead to elements being renegotiated, and it was important that any new service delivery made similar allowances.

The Sub-Committee asked if there were any non-essential aspects of the contract and heard that a great deal of the contract was statutory provision, with other elements mandated by GLA Collection Conformity. Street Cleansing was in line with best practice and there was scope to reduce the quality here to deliver savings, but it was questioned whether this was desirable. There were services in the contract that were non-statutory and were chargeable, and these included Bulky Waste and Garden Waste collections.

The Vice-Chair asked about how communication and engagement with residents could be improved. The Director of Sustainable Communities explained that there was a South London Waste Partnership communication and engagement plan, but that there needed to be a consideration of targeted communications on what was needed for Croydon. It was highlighted that the Residual Composition Analysis suggested that there needed to be better engagement and education on recycling, which could help with communal waste collections to maximise the collection of recyclates and resultant income.

Members asked about assisted bin collections and the Director of Sustainable Communities explained that a review of assisted collections had taken place recently to understand where these were still required. The review had reduced the number of assisted collections and going forward it was hoped this would be undertaken every couple of years as this had not been the case previously. The Cabinet Member for Streets & Environment explained that they had undertaken walkabouts with crews and assisted collections had been identified as an issue due to the large number that had accrued before the review. The Sub-Committee suggested that those who only needed the service for a short time should be able to state this when they applied for it.

The Chair asked how it would be ensured that the current service was maintained to a sufficient level until the end of the existing contract in 2025. Members heard that performance would be monitored, as it had been, in addition to the continued use of the performance bond. The Director of Sustainable Communities explained that the current contractor would also likely want to bid for any new contract, which would incentivise good performance.

The Chair asked about hotspots for missed collections, poor street cleansing and fly-tipping, and heard that these were monitored through daily conversations with the contractor to see what could be done to address identified area through targeted responses. The Sub-Committee heard that fly-tipping was a challenge in the North of the borough, and this was difficult to tackle given the requirements of needing to witness perpetrators in the act; there was an aspiration to try more innovative ways to tackle fly-tipping and change behaviours as part of any future service delivery. The Cabinet Member for Streets & Environment explained that they were keen to educate residents on reporting through the proper channels to try to build good data on hotspots so that they could be better tackled; work on this had already begun with residents groups, and would hopefully continue with 'Street Champions'.

The Vice-Chair asked about resident awareness of the bulky waste collection service and whether better awareness, or reduced charges, could result in lower levels of fly-tipping. The Director of Sustainable Communities acknowledged that there were probably some residents who were not aware of the service; having been through periods when the service was free and charged, as it was currently, had not shown an impact on the levels of fly-tipping in the borough. The Chair asked about cases where fly-tips had been reported, and then moved on to private land by contractors; the Director of

Sustainable Communities responded that this was not acceptable and that they would look into this personally.

Members highlighted cases where residents were required to separate different types of waste by different bags, and replacement bags were not being provided in a timely manner. It was asked if this type of collection would continue under a new service or this would be replaced with wheelie bins. The Director of Sustainable Communities explained that the vast majority of properties did use a wheelie bin, but a bagged service was provided to some properties who were unable to accommodate wheelie bins; the challenge around the bag service was that bags were provided by the contractor and it was acknowledged there could be delayed. The Sub-Committee heard that this was a performance issue that could be picked up with the contractor. Wheelie bins were the preferred solution, and any individual cases of kerbside properties that could accommodate bins using a bag service would be looked at on a case-by-case basis.

The Chair invited Councillor Ben-Hassel to ask a question about whether Bulky Waste collection would be looked at from a social enterprise perspective to enable the reuse of waste items. The Director of Sustainable Communities explained that this was already something that the Council considered but that more could be done to innovate on 'circular economy' practices under any new service delivery.

Councillor Ben-Hassel asked what the Planning department could do about flats above shops without the necessary waste infrastructure under the upcoming Review of the Local Plan. The Director of Sustainable Communities explained that there was a limited amount that the planning authority could do for these types of development and acknowledged that this was a challenge. There was limited provision for off-street bins, but Members heard that there were conversations that could take place with freeholders and shops. The Director of Planning & Sustainable Regeneration explained that this was a planning consideration for these types of application but this was a complex area.

The Chair asked how Members would be able to collaboratively feed into the process going forward, in lieu of a cross party working group. The Director of Sustainable Communities explained that the Resident Survey results would be used, alongside the points raised at Sub-Committee meetings to inform the development of the contract. It was explained that a holistic approach was preferred over Member focus groups as it was felt that this would provide more representative data from a larger set of Croydon residents that also included Councillors. Preliminary feedback from the Resident Survey had only just been received, and focus groups with residents would be meeting to discuss issues raised in the survey alongside telephone interviews; this would be combined into a report that would be completed in April 2023.

Conclusions

The Sub-Committee were of the view that officers and the Cabinet Member had a good understanding of the work that needed to happen, but Members acknowledged that it was a challenging market for Waste, Recycling and Street Cleansing.

Recommendations

1. The Sub-Committee recognised the large number of households in the Borough that used communal bins, and recommended that this was a focus in the specification of the Waste, Recycling and Street Cleansing Contract Specification.
2. The Sub-Committee recommended that a dynamic approach to behavioural changes was adapted as a part of any future service delivery to ensure effective engagement and communications with residents.
3. The Sub-Committee recommended that there was a continuation of an 'as-is' service for residents in terms of collection frequency.

13/23 Cabinet Report - Local Planning Authority Service Transformation

The Sub-Committee considered a report set out on pages 29 to 120 of the agenda, which provided the Cabinet report on Local Planning Authority Service Transformation. The Corporate Director of Sustainable Communities, Regeneration and Economic Recovery (SCRER) introduced the item and went through the presentation, appended to these minutes, on the report that covered the findings of the Planning Advisory Service (PAS) review (Appendix 1 of the Cabinet report) and the Council's response to its recommendations.

The Chair asked how the workstreams would be managed and prioritised. The Corporate Director of SCRER explained this was still in its very early stages, but that there would be a project plan for each workstream. Members heard that the appointment of the Planning Improvement Manager was key and would follow building capacity for transformation into the service. Once the Planning Improvement Manager was in post, the workstreams, project plans and programme would be established; as part of this, how to monitor and report on progress would be considered. The Chair asked if every recommendation from the PAS review would be addressed, and the Corporate Director of SCRER explained that the review was a snapshot of the service and that the recommendations would need to be prioritised, with most of them directly addressed.

The Vice-Chair queried the Planning Department's current strategy and asked how resources would be prioritised over the coming months. The Chair enquired how the tensions between the budget, delivery of services and

transformation would be managed. The Corporate Director of SCRER responded that there had been reductions in the number of staff and shortfalls in income generated by planning applications, which had made it difficult to resource the service and address capacity issues. There had been a budget correction of £1 million in recognition that income targets had been less than what had been achieved. Members heard that there was a continuing risk of reduced income from a downturn in planning applications.

Members asked what checks and balances were being put in place to ensure the department remained resilient. The Corporate Director of SCRER highlighted the importance of correctly resourcing the department, and noted the particular pressures that had been felt during the pandemic. Members heard that improvements to efficiencies, processes and IT were important to make workloads more manageable for staff. The Cabinet Member for Planning & Regeneration explained that the PAS review, Mayor's Business Plan and National Policy changes would all be used to inform transformation plans. The Cabinet Member highlighted the strong governance structures in place for the programme and importance of workforce development in ensuring it was a success.

The Vice-Chair asked how different the service was now in comparison to when the PAS review was conducted, and the Cabinet Member for Planning and Regeneration explained that the department was on an improvement journey, and was making good progress. The Corporate Director of SCRER explained that recruitment to planning roles was a national challenge, particularly in London, and that work to clear the backlog of planning applications was ongoing, but that progress was being made. The Chair asked how well the backlog was being managed, and the Director of Planning & Sustainable Regeneration explained that headway had been made in reducing the backlog from roughly 1800 to below 1000 over the last 12 months. Members heard that around 800 live applications was thought to be a manageable amount. The backlog had been reviewed to ascertain the age of applications and it had been found around 2/3 were 'out of time', with around 1/3 'in time'; the Sub-Committee heard that the aspiration was to flip these ratios. Clearance weeks were taking place roughly once a month to help reduce the backlog, and recently had also been used to also review the 'out of time' applications to analyse why these had not yet been determined. Members heard this had been successful in making progress for these older applications and that learning from each clearance week was taken forward to improve processes. The Cabinet Member for Planning & Regeneration highlighted the digitalisation workstream and explained that it was hoped this would further help with prioritising applications for determination in future.

The Sub-Committee asked about references to 'Vexatious Complainants' and the Corporate Director of SCRER explained that this report had been written by an independent panel and the term had been used to refer to persistent complaints that had been thought to be unfounded upon investigation. The Chair noted that the service was struggling to respond to complaints in a timely manner, and asked about the possible risks of this. The Corporate Director of SCRER explained that response times had improved, but that

some complaints were complex, and required detailed responses which could take time to fully investigate; it was highlighted that responding to complaints also needed to be carefully balanced with determining applications. The Director of Planning & Sustainable Regeneration added that complaints could be complicated and entangled with enforcement issues, which could draw out the length of time it took to respond.

The Chair asked about Resident Engagement meetings and heard that these were held twice a year, however, were not a statutory requirement; Members heard a Developer Forum was also held twice a year. Resident Engagement meetings were in person, as it was felt this assisted in breaking down barriers, but it was acknowledged that hybrid meetings could be easier for some residents for a variety of reasons. The Sub-Committee heard that the Director for Planning & Sustainable Regeneration was working with the Cabinet Member and Mayor about how these meetings would look going forward. The Chair highlighted the accessibility needs of some residents that could be better met through a hybrid provision. The Sub-Committee asked the Director of Planning & Sustainable Regeneration to ensure Ward Councillors were invited to Resident Engagement meetings going forward.

The Vice-Chair asked about the review of houses in multiple occupation (HMO) policies. The Corporate Director of SCRER responded that the HMO policy could be provided in writing outside of the meeting, and explained that there was a difference between planning policy, how planners looked at conversions to HMOs and the conditions inside of HMOs. The Local Plan Review would look at the cumulative impact of the proliferation of HMOs in the borough, but the private-sector Housing department were responsible for looking at the conditions inside of HMOs.

The Vice-Chair highlighted the loss of retail units on highstreets where conversions to HMOs took place. The Director of Planning & Sustainable Regeneration explained that there had not been a great deal of this kind of Permitted Development in Croydon Town Centre, but acknowledged that this was a concern for District Centres. An Article 4 had been considered for Croydon, but Members heard that the Government had set the bar for this at such a high level that it was thought not to be achievable; an Article 4 also required sign off from the Secretary of State. The Sub-Committee heard that other London authorities had applied for Article 4s and that these had been curtailed dramatically or rejected entirely. The Director of Planning & Sustainable Regeneration stated that they would keep an eye on this area, but that in their opinion applying for an Article 4 was not a wise use of resources at this time. The Cabinet Member for Planning & Regeneration explained that there were a large number of properties in the borough that had been converted to HMOs without permission that were only just being discovered, and that the Council was becoming stricter on its granting of HMO Licences, and engaging in greater levels of enforcement activity.

The Chair invited Councillor Ben-Hassel to ask a question regarding a previous Article 4 impacting houses with more than three bedrooms and whether this would be revoked. The Corporate Director of SCRER explained

that the scope and timeline for the Review of the Local Plan would be brought to the next Cabinet Meeting; the review would look at the impacts and successes of existing policy and how these could be built on to meet objectives around HMOs. On whether HMO Licensing fees would be increased, the Sub-Committee heard that these had not been increased this year.

The Chair asked how housing targets would be met in light of the proposed removal of intensification areas. The Director of Planning & Sustainable Regeneration explained that the small site development target of 641 units per year would be retained; intensification would still occur, despite the areas being removed, but the approach would shift to focus on character over density. Housing targets were on track to be met, and the Five Year Housing Land Supply had been met for the last year.

The Chair asked if there was sufficient resource had been allocated to tackle the six workstreams in the transformation programme. The Corporate Director of SCRER explained that greater capacity was always desirable, but that funding had been allocated to the programme and was currently sufficient. Members heard that some aspects of the programme, particularly digitalisation, might require more funding than had currently been allocated; if there was a business case to do so, it may be the case that transformation funding from other areas could be redirected to the Planning transformation programme. In response to questions on how the Review of the Local Plan would be funded, the Sub-Committee heard that an earmarked reserve for this was built into the budget.

The Chair asked what options were being considered in the Community Infrastructure Levy (CIL) review. Members heard that the review would look at the collection of monies rather than allocation, ensuring processes and systems were correct, and that training and oversight for staff was in place. The Chair asked if officers were confident that the CIL funding formula was correct, and the Director of Planning & Sustainable Regeneration explained that this had been correct at the time it was set up, and broadly worked, but that there were improvements that could be made. Correct and timely collection of CIL was highlighted as an important income stream.

The Chair asked about the absence of enforcement in the Head of Development job description, and Members heard that a Deputy Head of service role had been deleted since the job description was written, and replaced with a 'Team Leader of Enforcement' which had been found to be insufficient. This was being reviewed as part of the transformation programme to ensure there was sufficient senior capacity and oversight for enforcement. The Sub-Committee queried the unfunded role in paragraph 2.11, on page 58 of the agenda pack; the Director of Planning & Sustainable Regeneration explained this would be funded by CIL administration monies and Pre-Application Advice fees.

Members asked about the deployment of temporary staff to address the enforcement backlog. The Director of Planning & Sustainable Regeneration

explained that temporary staff in enforcement only covered for vacant positions, and highlighted the national difficulties in recruiting to enforcement posts. Members heard that there was ongoing work to revise the job description for the 'Deputy Team Leader' post to turn this into a 'Team Leader' post, so that a permanent staff member could be recruited. Recruitment had been ongoing, with a permanent member of staff due to fill the last open vacancy soon. The Director of Planning & Sustainable Regeneration explained that agency staff were helping to manage current caseloads and reduce the backlog by participating in clearance weeks, and closing down cases where possible. The Corporate Director of SCRER highlighted the busy nature of planning in Croydon, and the importance of ensuring enforcement officers prioritised cases. In response to questions about the size of the enforcement department, the Corporate Director of SCRER explained that the service was small for the size of the borough. The Director of Planning & Sustainable Regeneration highlighted the importance of providing development opportunities for enforcement staff going forward.

The Vice-Chair asked about the planned actions for Q1 2023/24 under 'Review the Resourcing of the Planning Service' on page 107 of the agenda, and raised concerns that these had not yet commenced. The Corporate Director of SCRER explained that the backlog had already been reduced without additional resource. Members heard that the Planning Improvement Manager would be looking at programme management, workstreams and ensuring that progress was taking place; budget for this had already been approved and the recruitment process had begun. The budget correction that had taken place did not provide additional resource to the service, and it was acknowledged that it would be a challenge for the department to deliver transformation with the small amount of transformation funding and existing resources it had. The Chair asked if this was reasonable and whether transformation could be delivered within current resource. The Corporate Director of SCRER responded that greater capacity and resourcing was desirable, but that a great deal was possible with the existing resources of the department. Members heard that the Government was consulting on planning fees, which could potentially increase the resources available should these increase. The Director of Planning & Sustainable Regeneration explained that better IT implementation and efficiencies would speed up determinations and increase officer productivity. The Cabinet Member for Planning and Regeneration highlighted a number of quick wins in digitalisation that were attainable for the service.

The Chair highlighted the importance of staff welfare and Members asked how frequently staff were working overtime, and whether they were compensated or given time in lieu. The Director of Planning & Sustainable Regeneration explained that a great number of staff worked beyond their contracted hours, and that it was important to set boundaries to ensure staff were not overburdening themselves; staff were provided compensation or time in lieu as appropriate for overtime. The Chair asked about staff turnover, and heard that this had been higher over the last couple of years, but that there were many staff members who had been in Croydon for significant periods of time, and staff who had left and come back. The PAS review had

acknowledged comradery between officers in the department, and the Director of Planning & Sustainable Regeneration acknowledged the importance of developing officers and providing a compelling offer to keep staff in Croydon; Members heard that this would be a focus of the transformation programme.

In response to a question from the Chair about the consistency of responses to applications, appeals and enquiries, the Director of Planning & Sustainable Regeneration explained that consistency was ensured through strong processes that were in place to manage this, using a multi-disciplinary approach for complex applications. Further evidence for this was demonstrated by a strong track record with appeals.

The Chair asked about the implication of national policy changes for Croydon. The Director of Planning & Sustainable Regeneration explained that national policy changes were always being considered by Government, and that the department kept abreast of proposed changes, making changes to respond to new policy where required. The Government were keen to encourage digitalisation, which formed a workstream in the transformation programme, but there were no large changes to national policy on the horizon.

The Chair asked about what lessons could be learned from other internal transformation projects, and from other planning authorities. The Corporate Director of SCRER explained that PAS reports were useful resources in directing transformation programmes, and that focussing on workforce and digitalisation would be key in transforming the Planning service.

Conclusions

The Sub-Committee were of the view that the digitalisation and workforce workstreams would be key in ensuring that transformation of the Planning department was successful, and that the Sub-Committee should continue to monitor progress in these areas.

The Sub-Committee were keen to receive a briefing on the proposed CIL review, and were of the view that this should be an addition to the 2023/24 work programme.

The Sub-Committee concluded that they should be provided with a written copy of the Council's HMO Policy.

Recommendations.

The Sub-Committee recommended that Councillors be invited to attend future Resident Engagement events.

14/23 Period 8 Financial Performance Report

The Sub-Committee considered a report set out on pages 121 to 164 of the agenda that provided the Cabinet Report on Period 8 Financial Performance for Members to ascertain whether they are reassured about the delivery of the 2022-23 Sustainable Communities, Regeneration & Economic Recovery Budget.

The Chair asked about risks and opportunities outlined in the report for the SCRER department. The Corporate Director of SCRER explained that some of the risks were around Capital recharges; income at risk from difficulty recruiting civil enforcement officers; parking income; and additional energy costs. Members heard that agency staff were being used to fill civil enforcement officer roles, and there were efforts to convert agency staff to permanent employment after a period of time. Opportunities for SCRER were around using CIL to support revenue expenditure; highways savings; parking income; and recharges to the Housing Revenue Account. The Chair asked where CIL would be used to support revenue expenditure and Members were informed that this used to address, in part, where development in the borough was increasing demand on services.

On Automatic Number Plate Recognition (ANPR) Cameras, the Corporate Director of SCRER explained that School Streets and Healthy Neighbourhoods cameras continued to be rolled out, but it was acknowledged that there had been delays due to operational and functional issues. The Sub-Committee heard that work was ongoing with contractors to ensure this is progressed.

15/23 Scrutiny Work Programme 2022-23

The Sub-Committee noted the report.

The meeting ended at 9.29 pm

Signed:

Date:

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Planning Transformation Progamme

March 2023

PAS Report



Planning Advisory Service

The Planning Advisory Service (PAS) provides consultancy and peer support, learning events and online resources to help local authorities understand and respond to planning reform.

- Funded by the Local Government Association
- Act as critical friend to Local Planning Authorities

Peer Challenge and DM Process Review

- PAS Invited by the Council – as ‘critical friends’
- Not an inspection or audit

PAS worked with the Planning Service based on self-assessment, wider document review, on-site interviews, and focus groups

- Committee Member training:
 - Defendable Decision Making
 - 5 Year Housing Land Supply

PAS Looked at...

- Development management performance.
- Efficiencies and effectiveness of Planning Committee
- Enforcement
- Relationship with customers and management of complaints
- Planning staff structures

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These were examined across five broad themes covering:

1. Vision and leadership
2. Service Performance & Management
3. Community engagement
4. Partner engagement
5. Achieving outcomes

Over- arching messages

- *There is a significant breakdown in communication and trust between Officers, Members and the public HOWEVER you have a great opportunity to reset and rebuild that trust and strengthen leadership*
- *The Planning Dept is under resourced and if you continue as you are the service will break and everyone will suffer as a consequence. Planning is a major income source but it must be sufficiently resourced to generate income*
- *Whilst many of your practices and procedures are very good, others are causing you to work inefficiently and these must be changed in parallel with a review of resources*
- *There is a clear willingness from officers and Members to learn from elsewhere and from each other – embrace this*

Vision & Leadership

Strengths

- The Planning service has some excellent practices and clearly has experienced, knowledgeable and dedicated staff
- Chair of Planning is keen to learn from best practice and there is a willingness by Members to learn from other authorities.
- Both officers and members want to change Planning Committee to have shorter/more productive meetings
- SPD2 will be withdrawn and opportunity for officers and members to work together to rebuild trust and be confident of making sound decisions
- Member training is valued and there is a commitment to ongoing training
- Manifestos in the Local Election recognised the need for change. There is an opportunity to de-politicise Planning with the right Leadership approach

Vision & Leadership

Areas for Improvement

- The service is currently firefighting and losing. Take a strategic view on efficiencies and best use of available resources.
- There is a need to re-build trust and relationships: Members Officers - Residents
- Planning sub committee not clearly understood and felt to be unnecessary
- A need to invest in staff – Training and Mentoring
- Officers and Members are the subject of personal attack

Vision & Leadership

Recommendations

- The Planning transformation is part of a Corporate transformation. Consequences to under resourcing and recognition of the income generation
- Improve engagement with residents, partners and developers. Consider additional Comms resource and a strategy to counter the negative narrative that has become the norm including 'Inside Croydon'
- Learn from best practice elsewhere - PAS as an option for member training
- Invest in staff to ensure retention and consider mentoring for key staff
- Utilise the willingness on all sides to re-set relationships and trust between officers and members. This should result in shorter more productive Planning meetings

Service Performance & Management

Strengths

- High quality of officers – professional and dedicated
- Very high quality and clear officer reports
- Some good experiences from developers on the pre app process
- Some sound processes and procedures in place
- Current staffing structure (rather than actual staff numbers) meets the Planning requirements of Croydon.

Service Performance & Management

Areas for improvement

- Rethink Validation process
- IT is set up is not fit for purpose and wastes resources
- Too much management time taken up with complaints and issues with vexatious complainants
- Responses to enforcement enquiries are not meeting resident's and Member expectations
- Poor communication on CIL and S106 spend leads to mistrust within the community
- Lack of internal consultee support impacting on performance and sound decision making e.g. Legal advice is harming delivery and risking reputation

Service Performance & Management

Recommendations

- Review approach to validation - performance versus customer service.
- Focus on IT investment as part of a wider transformation programme for the Council to speed up processes and avoid wasteful use of officer time
- Review management capacity in Enforcement to meet Member and residents' expectations
- Carry out an enforcement 'blitz' to reduce number of cases and refocus cases in accordance with the priorities set out in the enforcement policy

Community engagement

Strengths

- Some good relationships built with individual officers
- Members and Officers want to rebuild trust with the community
- Residents and agents forums are held
- Engaged and active residents associations

Community engagement

Areas for improvement

- A complete breakdown in relationships. Need to do the basics right on communication and engagement e.g. answer the phone, emails etc
- Lack of communication has created suspicion and lack of transparency that has created a breakdown in trust
- Personal attacks has undermined confidence, impacted wellbeing and affected ability to recruit

Community engagement

Recommendations

- Develop a strategy for effective engagement and communication to rebuild trust
- Undertake targeted enforcement initiatives that demonstrated delivery to the public and Members
- Carry out some quick wins with the community e.g. Website improvements and customer response times
- Provide transparency on how the Council implements the 'Chinese wall' and other conflicts of interest.
- Embrace residents' desire to get involved and work with Planning so that it is a positive relationship

Partnership engagement

Strengths

- Good relationships between individual officers and consultees
- Consultees / stakeholders think well of individual planning officers
- Pre-app and PPAs considered well by agents for Major developments

Partnership engagement

Areas for improvement

- Regular meetings to discuss issues, use this as training for more junior staff
- Lack of confidence from junior officers to make decisions
- There is the opportunity to upskill all officers, learn from each other
- Build workflows/processes, set timescales, stick to them
- Work more closely internally, Why recharges?
- PPA funding is not being maximised and an important income source is potentially being lost

Partnership engagement

Recommendations

- Time management – standard responses, standing advice, standard conditions, basic training and upskilling
- Refocus pre app and PPAs procedures to provide better service to customer and maximise income
- Continue Major/Strategic apps meeting. Training tool for junior officers,
- Re-instate regular liaison / catch ups with internal and external consultees
- Flow chart – engage with internal consultees, so they know what advice you expect from them
- Assess consultations – Can officers upskill to do minors. Review who you consult and why

Achieving outcomes

Strengths

- Sound scheme of delegation
- The process of the Local Plan Review is an example of good plan making
- The willingness of Members to engage in the review of the strategy and the benefits of the local approach to the London Plan intensification policy.
- Members are keen to undertake training and learn from elsewhere on all areas of Planning
- Dedicated and knowledgeable Planning officers to deliver the Council's objectives

DM Planning Transformation Action Plan

The recommendations of the PAS reviews have been grouped in the following areas:

- Resource and Performance Management
- Technological Improvements
- Officer Training, Development, Morale, and Retention
- Internal Process Review
- Communication and Engagement
- Planning Policy, Procedure Development
- Planning Committee

Planning Transformation Programme

Planning Transformation Programme

- Responds to successive budget savings
- Responds to the Mayor's Business Plan
- Responds to National Planning Policy changes
- Responds to Corporate Governance Reviews
- Appointment of a Planning Improvement Manager to provide capacity and resource and drive delivery

Mayors Business Plan

Outcome 2: Croydon is a place of opportunity for business, earning and learning

Outcome 4: Croydon is a cleaner, safer and healthier place, a borough we're proud

1. Priority: Support the regeneration of Croydon's town and district centres, seeking inward investment and grants

The Council will work with businesses and residents to develop a new, sustainable plan to regenerate Croydon town centre that responds to changes in the retail and leisure industry. Together we will develop collaborative strategies, seek inward investment and apply for grants to revive our high streets and district hubs, and unleash Croydon's economic potential.

With our partners we will:

- Develop and deliver a clear shared vision with businesses, developers and residents to steer our town centre and high street recovery.
- Launch an exciting inward investment campaign for Croydon to attract new businesses and jobs in growth sectors.

4. Priority: Ensure new homes are safe, well-designed and in keeping with the local area

New development will be design-led, not density-led. While we must continue to plan for new homes, schemes must respect the views of local people, enhance the character of our places, and recognise the need for amenity space.

We will:

- Review Croydon's Local Plan to remove intensification zones, support sustainable development and emphasise design and character over density.
- Revoke the SPD2 Suburban Design Guide.
- Review conservation areas to ensure the borough's special places are protected for generations to come.
- Review the planning and enforcement service to identify the resources needed to improve the service for customers.
- Enforce policies to tackle the cumulative impact of houses in multiple occupation.

Governance and initial scope of programme



LONDON BOROUGH OF CROYDON

REPORT:	Streets & Environment Sub-Committee
DATE	11 July 2023
REPORT TITLE:	Period 1 Financial Performance Report
LEAD OFFICER:	Nick Hibberd - Corporate Director of Sustainable Communities, Regeneration & Economic Recovery
PERSON LEADING AT SCRUTINY COMMITTEE MEETING:	Nick Hibberd - Corporate Director of Sustainable Communities, Regeneration & Economic Recovery
LEAD MEMBER:	<p style="text-align: right;">Councillor Scott Roche Cabinet Member for Streets and Environment</p> <p style="text-align: right;">Councillor Jeet Bains Cabinet Member for Planning and Regeneration</p>
ORIGIN OF ITEM:	This item is included on the Streets & Environment Sub-Committee Work Programme for 2023/24 as a standing item to be reviewed by exception.
BRIEF FOR THE COMMITTEE:	The Sub-Committee is asked to scrutinise the information provided with a view to considering whether it is reassured about the delivery of the 2023-24 Sustainable Communities, Regeneration & Economic Recovery Budget.
PUBLIC/EXEMPT:	Public

1 PERIOD 1 FINANCIAL PERFORMANCE REPORT

- 1.1 The Streets & Environment Sub-Committee has asked to be provided with the most recent Cabinet Financial Performance report to review the delivery of the 2023-24 Sustainable Communities, Regeneration & Economic Recovery Budget.
- 1.2 The Streets & Environment Sub-Committee is asked to review the information on the Sustainable Communities, Regeneration & Economic Recovery Budget contained in the Cabinet report on Period 1 Financial Performance and to consider whether Members are reassured about its delivery.

2 APPENDICES

2.1 Appendix A - Period 1 Financial Performance Report

3 BACKGROUND DOCUMENTS

3.1 None

LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	28 June 2023	
REPORT TITLE:	2023-24 Period 1 Financial Performance Report	
CORPORATE DIRECTOR	Jane West Corporate Director of Resources (Section 151 Officer)	
LEAD OFFICER:	Allister Bannin, Director of Finance (Deputy S151)	
LEAD MEMBER:	Cllr Jason Cummings, Cabinet Member for Finance	
KEY DECISION?	No	Reason: N/A
CONTAINS EXEMPT INFORMATION?	No	Public Grounds for the exemption: N/A
WARDS AFFECTED:	All	

1 SUMMARY OF REPORT

- 1.1** This report provides the Council's financial performance as at Period 1 (April 2023) for the General Fund, Housing Revenue Account (HRA) and the Capital Programme. The report forms part of the Council's financial management process for publicly reporting financial performance on a monthly basis.
- 1.2** It is not common practice for a Council to report at Period 1 due to the prioritisation of closing the accounts for the previous financial year, however it was agreed at Audit and Governance Committee on 13/10/22 that a narrative only report would be provided for Period 1 of 2023-24. This recognises the financial difficulties that Croydon Council continues to face and the changing financial position during 2022-23 arising from the Opening the Books exercise.
- 1.3** The Council's 2023-24 budget required capitalisation directions from government of £63m to balance. The main reason for this is the Council's historic legacy borrowing and debt burden which continues to be critical to the sustainability of the Council's revenue budget.

2 RECOMMENDATIONS

For the reasons set out in the report, the Executive Mayor in Cabinet is recommended:

- 2.1** to note the General Fund revenue budget risks as detailed in the directorate sections of the report.
- 2.2** to note the Housing Revenue Account (HRA) revenue budget risks as detailed in the report.
- 2.3** to note the Council's historic legacy borrowing and debt burden continues to be critical to the sustainability of the Council's revenue budget. Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regard to its level of indebtedness and balancing the budget to ensure it can deliver sustainable local government services.
- 2.4** to note that the Council continues to operate Spend Control Panels to ensure that tight financial control and assurance oversight are maintained.
- 2.5** to note the work that has commenced on the Council's Transformation Programme as set out from paragraph 4.43.

3 REASONS FOR RECOMMENDATIONS

- 3.1** The Financial Performance Report is presented monthly to Cabinet and provides a detailed breakdown of the Council's financial position and the in-year challenges it faces. It covers the General Fund, Housing Revenue Account (HRA) and Capital Programme. The Financial Performance Report ensures there is transparency in the financial position, and enables scrutiny by the Executive Mayor, Cabinet, Scrutiny & Overview Committee and the public. It offers reassurance regarding the commitment by Chief Officers to more effective financial management and discipline.

4 BACKGROUND AND DETAILS

- 4.1** The end of year closing of the financial accounts for 2022-23 is still underway. It is expected that the Council will breakeven against the General Fund 2022-23 budget, however this is following the utilisation of capitalisation directions requested from DLUHC to resolve historical inaccurate accounting treatments and to fund the ongoing annual servicing of debt.

Cost of Living Considerations

- 4.2** There are a number of inflationary pressures that the Council, like all local authorities, is managing. The UK's Consumer Prices Index (CPI) inflation rate was 10.1% in the 12 months to March 2023, remaining consistently high following the Office for National Statistics (ONS) reporting in November 2022 that the CPI hit 11.1% in October 2022 (reaching the highest level since 1981). This impact goes beyond the Council as the cost of living is affecting all households and businesses.
- 4.3** These macro-economic factors are impacted by international events, and therefore well beyond the control of Croydon Council. Despite the limitations, the Council is seeking to support households wherever possible.
- 4.4** A dedicated cost of living information hub has been established on the Council's website. This provides a single source of information, informing residents of the financial support available and signposting to further support, advice and guidance. This information is continually reviewed, updated and improved.
- 4.5** At a national level, household support was announced in the form of a revised energy price guarantee, designed to limit the inflation on household energy bills. Households with a domestic energy connection have been eligible for a £400 discount over the winter and residents on means-tested benefits have been eligible for a £650 cost of living payment from Government.
- 4.6** The Council provides a wide range of support for residents that may be struggling due to the cost of living pressures. These include:
- Discretionary support for residents in financial hardship, including the Household Support Fund
 - Council Tax support – for residents on a low income or in receipt of benefits, Council Tax bills could be reduced by up to 100%
 - Council Tax Hardship Fund (supporting low income households that cannot afford to pay their full increase in Council Tax)
 - Benefits calculator, to ensure residents receive the support to which they are entitled
 - Energy advice, including heating and money saving options, through our Croydon Healthy Homes service
 - Free holiday activity clubs with healthy meals for children
 - Croydon Works to help residents into employment or to receive training to support them into work and funding of the voluntary sector to provide advice and guidance
- 4.7** The cost of living information hub also signposts residents to a range of support provided by other organisations in Croydon, including:
- NHS Healthy Start vouchers for families
 - Free school meals
 - Support from voluntary, community and faith sector organisations

- Support for businesses through the London Business Hub and the British Business Bank
- CroydonPlus credit union which offers affordable ways to manage money, including savings accounts and loans

Savings

- 4.8** The 2023-24 budgets include a challenging savings target of £33.1m. Progress in achieving savings will be monitored throughout the year and reported in monthly financial performance reports to Cabinet from Period 2.
- 4.9** Directorates will identify any risks to achievement of individual savings and make plans to mitigate these risks where possible or identify alternative savings as required.

Adult Social Care and Health (ASCH)

- 4.10** The ASCH Directorate has challenging savings targets totalling circa £10m to deliver in 2023-24 on placements and care packages through demand management, commissioning and review of care packages. Risks continue in the provider market from inflation including higher fuel, labour and property costs which may result in claims for increased fees and/or financial instability with the potential for 'handing back' contracts.
- 4.11** Staffing underspends are expected to continue from periods of vacancy above the £1m MTFS 5% vacancy factor saving applied to staffing budgets in 2023-24. There is a national shortage of both social workers and occupational therapists and recruitment to many roles is proving challenging. The periods of vacancy are a barrier to achieving savings as staff are focussed on statutory delivery rather than delivering transformation to improve performance, data management and reduce operational risks across the directorate.

Assistant Chief Executive (ACE)

- 4.12** Recruitment is continuing into the new staffing structure for the Policy, Programmes and Performance Division and there may be a short-term underspend in 2023-24 from periods of vacancy.
- 4.13** Learning & Organisational Development is commissioning and delivering a cross-Council package of training and it is expected that the training budget will be utilised in full.
- 4.14** The Croydon Digital and Resident Access Division will undergo a restructure to achieve MTFS staffing savings and is also working on MTFS savings in IT contracts.
- 4.15** The Public Health Division is expecting to underspend again in 2023-24. This is on top of increased one-off contributions to Public Health eligible spend across the Council, pending 2024-25 MTFS General Fund savings to be found through permanent Public Health grant allocations.

- 4.16** The Council has received grant funding towards the support of Refugees and Asylum Seekers and the underspend from 2022-23 has been carried forward in an earmarked reserve to fund ongoing expenditure in 2023-24.

Children, Young People and Education (CYPE)

- 4.17** The Children's Social Care Division will monitor placement and care package expenditure during the year. There may be staffing underspends from periods of vacancy and an underspend in legal costs (if the lower numbers of care proceedings and UASC age assessment challenges continue) to help mitigate pressures. The Division is producing service level agreements for reviewed HRA funding towards Youth Engagement and Youth Offending services, and these may result in a General Fund pressure. The Division is also reviewing the housing accommodation charges from the Housing General Fund for Care Experienced Young People.
- 4.18** The Quality, Commissioning and Performance Improvement Division may continue to experience a staffing underspend from periods of vacancy (above the 5% vacancy factor MTFs saving of £0.3m applied to the 2023-24 budget).
- 4.19** Non-DSG Education services may continue to experience underspends from periods of staffing vacancy and increased Traded Services income. There is a continuing pressure of £0.3m from under-achievement in income due to a prior year MTFs income saving (NHS funding towards speech and language therapy) not achieved.
- 4.20** Dedicated Schools Grant (DSG) High Needs education services will be closely monitoring the cost pressures in Special School placements and Out of Borough placement costs. There are ongoing transformation projects which are delivering savings to reduce pressures within the high needs block as part of the DfE Safety Valve programme.

Housing

- 4.21** The Housing Directorate continues to be impacted by the rapidly worsening housing market within London as private sector landlords are increasing rents or leaving the market, and tenants are struggling with cost of living pressures.
- 4.22** The challenge for Croydon in dealing with such rapid inflation has multiple strands. There are forecasting difficulties in predicting how much prices are expected to move and at what pace. This is being addressed alongside a wholesale review of the forecasting process to ensure that reporting provides the full position on risk in 2023-24.
- 4.23** There are difficulties in negotiating and approving price rises without losing properties or fuelling the rises further. Regular meetings with neighbouring boroughs are being held to ensure collective agreements are being made with the larger providers of emergency accommodation.
- 4.24** There is also the issue of entering into 2 to 5 years lease deals with landlords as 39% exited the market in 2022-23 and prices have dramatically increased as a result. In

2022-23 this meant a 10% increase in the use of nightly paid accommodation was seen. The strategy work currently underway in the Directorate will address this issue.

- 4.25** There has also been a concerted effort to hold homelessness accommodation costs down across London through partnerships with organisations like Capital Letters and via the agreed Pan-London temporary accommodation rates. The rates can no longer be contained though as demand outweighs available affordable supply. At a Pan London meeting, all boroughs confirmed that they are no longer paying the agreed Pan London rates to ensure they meet their demand challenges. A combination of all these factors has led to an increase in both the average cost of emergency and temporary accommodation that Croydon can secure to meet demand, as well as an increase in the use of nightly paid emergency accommodation to compensate for the loss of some longer-term leased accommodation because of landlords leaving the market.
- 4.26** Pressures are expected to continue in 2023-24. The restructure for Housing Options is underway and will form the bedrock for process change and a more cohesive journey for a homeless household. An immediate switch to better practice and dramatically reduced spend on homelessness cannot be expected within 2023-24 whilst significant change is underway, and the financial benefits are expected to be realised in the longer term.
- 4.27** Income collection rates will need to be monitored closely in 2023-24. There may be a requirement to increase the loss allowance (bad debt provision) again in 2023-24 if income collection is not significantly improved. A new housing IT system (NEC) is being implemented which will improve monitoring and reporting.

Resources

- 4.28** The Finance Division will undergo a restructure of the accountancy service in 2023-24 and then commence recruitment into roles which are currently covered by agency staffing. The capacity and skills levels required in the accountancy service are being reviewed and a growth bid may be submitted for 2024-25 if needed.
- 4.29** There could be an underspend in the Payments, Revenues, Benefits and Debt Service from income over-achievement in court awarded costs, however this will be monitored throughout the year as the level is activity-based.
- 4.30** The Legal Services and Monitoring Officer Division is reviewing usage of external legal advice. It is planned to increase the inhouse staffing structure (moving budget from external legal expenditure in directorates) to provide more legal services internally and therefore reduce overall legal expenditure.

Sustainable Communities, Regeneration & Economic Recovery (SCRER)

- 4.31** The biggest pressure in the directorate continues to be from under-achievement in parking, parking enforcement and moving traffic offence income. Demand for parking services has not returned to pre-pandemic levels and this is affecting all areas of parking which includes Automated Number Plate Recognition (ANPR), pay and display and on-street parking.

- 4.32** Parking Services continue to have delays in connection with the roll out of new ANPR cameras which affect the income levels within the service. The Parking budget has been rebased for 2023-24 based on a timetabled roll out of Healthy Neighbourhood Schemes, so the delays in the implementation of the cameras continue to have a detrimental effect.
- 4.33** The SCRER directorate is expected to continue to have a staffing underspend in 2023-24 due to periods of vacancy.
- 4.34** The Culture and Community Safety Division leads on the London Borough of Culture 2023 activities, funded through external funding sources. This is a year-long celebration of Croydon's unique identity, diverse communities and rich heritage, culture and creativity. The programme for "This is Croydon" showcases Croydon to the world. It includes major events with international headliners performing alongside emerging home-grown talent, plus hundreds of cultural activities from our communities.
- 4.35** The Environment Act 2021 operates as the UK's new framework of environmental protection. Given that the UK has left the EU, new laws that relate to nature protection, water quality, clean air, as well as additional environmental protections that originally came from Brussels, needed to be established. The Act is a vehicle for a number of Department for Environment, Food and Rural Affairs' (Defra) different environmental policies and sets out the legal framework for significant reforms to local authority waste and recycling services, as well as creating new statutory duties for local authorities on nature recovery. The government has stated that additional burdens funding will be provided to local authorities for the new requirements as they come into force, however the Council will need to monitor closely the extra costs involved.

Corporate Items and Funding

- 4.36** The corporate area holds funding streams such as Council Tax, retained share of Business Rates and Core Grants. The corporate budget also holds a Council-wide risk contingency budget (£5m) and the budgets for borrowing and interest received.
- 4.37** The corporate area funds redundancy, severance and pension strain costs which contribute to achieving General Fund MTFs savings. There may be a pressure in 2023-24 from this area of costs due to the implementation of staffing savings.
- 4.38** The corporate area holds the central budget for pay and non-pay inflation. The requirement for directorates will be reviewed during 2023-24 (based on inflation experienced on contracts and NJC national negotiations on the pay award for staff) and the required budget allocation may create a pressure above the central allowance of £32.9m. There is a further budget of £5.5m held centrally for the potential impact of economic demand pressures on Croydon.
- 4.39** The corporate area also holds the 2023-24 Transformation budget of £10m, which will fund work carried out in directorates and cross-Council to achieve MTFs savings and improve services for local residents and businesses. The Transformation budget reduces to £5m from 2024-25.

- 4.40** There is £7.3m budget held in Corporate for adjustments to correct General Fund recharge budgets for recharges to the HRA and corporate support (overhead) recharges. This budget will be allocated during 2023-24 as the service level agreements (SLA's) are finalised for HRA recharges and when the review of corporate support recharges is finalised.
- 4.41** There is a funding risk in the Collection Fund if cost of living pressures impact the collection of Council Tax and Business Rates income. The impact of the Council Tax increase is partially mitigated through the Council Tax Hardship Fund (supporting low income households that cannot afford to pay their full increase in Council Tax).
- 4.42** There is borrowing cost uncertainty from interest rates (with the Bank of England currently continuing to increase the base rate) and the timing of capital receipts from asset disposals (assumed in the MTFS at circa £50m per annum).

Transformation Programme

- 4.43** The Transformation Programme has £14m of resources allocated to it, £4m in the 2022-23 Capital Programme and £10m in the 2023-24 revenue budget. The Transformation Programme published in November 2022 set out £5.9m of project commitments with recognition that further sums were still to be confirmed.
- 4.44** A new project to review the Croydon Adult Learning and Training (CALAT) service has been added to the programme with an initial £0.050m budget approved by the Corporate Director of Resources (S151 Officer).
- 4.45** Highlights from the transformation progress made to date include:
- The Business Intelligence Project is a cross-discipline officer group to identify areas where the council may be funding activities/discounts for residents who are not eligible. To date 1,911 invalid single person discounts have been cancelled, increasing Council Tax income by circa £0.9m. The project has also deactivated 474 Freedom Passes with investigations ongoing.
 - The HR Transformation work has concluded the restructure of the payroll team and is moving to implement the service changes.
 - The Housing Needs and Homelessness Service is undergoing major restructure affecting 168 staff within the division - 138 full-time and 30 part-time posts. The restructure will ensure that the Housing Needs and Homelessness service is fit-for-purpose and that all staff are skills-matched to the roles needed to deliver an efficient and effective Service. Formal consultation closed on 28th April 2023.
 - A review of the Community Equipment Service is proceeding at pace with a range of options being developed.

Housing Revenue Account (HRA)

4.46 The main risks within the Housing Revenue Account are:

- Repairs and maintenance:
 - pressures from the current Axis repairs contract, ending in August 2023, due to agreed changes in the payment model and negotiated inflationary increases.
 - extra expenditure to deal with the backlog of repairs and maintenance
 - void and disrepair costs carried out by specialist contractors to reduce void losses and minimise future disrepair claims.
 - settlement of disrepair cases and related legal fees, including those relating to Regina Road.

- Tenancy and income:
 - pressures in utility costs related to higher energy prices
 - the impact of cost of living pressures on rent collection (including a potential increase in bad debt cost)
 - loss of income due to void (empty) residential properties
 - loss of income due to void garages

- Recharge review:
 - General Fund services are producing service level agreements (SLA's) to evidence recharges of costs to the HRA, which could result in increased charges to the HRA.

4.47 There may be potential underspends in the HRA due to:

- staffing vacancies due to difficulties recruiting to specialist posts
- underspends in non-pay expenditure budgets including the contingency budget

Capital Programme and Financial Sustainability

4.48 The Capital strategy and programme was approved by Council in March 2023. This recognised the complex and challenging financial and operational circumstances in which the Council continues to find itself. It showed a 2023-24 Capital Programme that is reduced in scale and cost compared to previous years. With circa £1.3bn of General Fund debt and an environment of rising interest rates, the delivery of an effective Asset Management Plan and an ambitious Asset Disposal Strategy, including reducing the number of buildings used by the Council, will be essential to mitigate rising cost pressures, reduce the overall debt burden and help the Council balance its books.

4.49 The strategy reflected the progress made to date by the Council to improve the governance and financial management of the Capital Programme following recommendations from the two Reports in the Public Interest (RIPI). The Council understands that the initial improvements put in place are the foundations of good practice and is focused on building upon these over the coming months and years.

- 4.50** Concerns were highlighted regarding value for money and investment decisions as the Council has incurred debt in investing in assets which have not retained their value and therefore the level of debt exceeds the value of the investment assets. In the three years between 2017-20 the Council borrowed £545m with no focused debt management plan in place. The majority of this debt comprises short-term borrowings which has left the council exposed to current higher interest rates. The debt is anticipated to be refinanced from 2023 onwards and therefore likely to drive significant increases in annual repayment levels.
- 4.51** An estimated circa £66m is required to service this debt from the General Fund which represents around 16% of the Council's net budget. The Council's historic legacy borrowing and debt burden has therefore become critical to the sustainability of the Council's revenue budget.
- 4.52** The Council has concluded that the expenditure it is anticipated to incur in each year of the period of 2023-27 is likely to exceed the financial resources available and that reaching financial and operational sustainability without further government assistance will not be possible. The Council's 2023-24 budget required capitalisation directions from government of £63m to balance and the Medium Term Financial Strategy (MTFS) demonstrated an ongoing estimated budget gap of £38m per annum from 2024-25.
- 4.53** Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regards to its level of historic legacy indebtedness and balancing the budget to ensure it can deliver sustainable local government services. It must be noted that annual capitalisation directions (transferring revenue cost into capital cost which must be funded over 20 years) increases the Council's debt burden. Debt write-off is the Council's preferred option and therefore a request was made to DLUHC in January 2023 for government funding to write-off £540m of the Council's General Fund debt. DLUHC has subsequently asked the Council to propose a wider range of options and these are currently being worked on.

5 ALTERNATIVE OPTIONS CONSIDERED

- 5.1** It is not common practice for a Council to report at Period 1 due to the prioritisation of closing the accounts for the previous financial year, however it was agreed at Audit and Governance Committee on 13/10/22 that a narrative only report would be provided for Period 1 of 2023-24. This recognises the financial difficulties that Croydon Council continues to face and the changing financial position during 2022-23 arising from the Opening the Books exercise, however it is not expected that a Period 1 report will be presented next financial year.

6 CONSULTATION

6.1 None.

7. CONTRIBUTION TO COUNCIL PRIORITIES

7.1 The monthly financial performance report supports the Mayor's Business Plan 2022 – 2026 objective one "The council balances its books, listens to residents and delivers good sustainable services".

8. IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

8.1.1 Finance comments have been provided throughout this report.

8.1.2 The Council continues to operate with internal spending controls to ensure that tight financial control and assurance oversight are maintained. A new financial management culture is being implemented across the organisation through increased communication on financial issues and training for budget managers.

8.1.3 The Council currently has a General Fund Reserve of £27.5m which serves as a cushion should any overspend materialise by the end of 2023-24. The use of reserves to support the budget is not a permanent solution and reserves must be replenished back to a prudent level in subsequent years if used.

8.1.4 The Council's historic legacy borrowing and debt burden continues to be critical to the sustainability of the Council's revenue budget. Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regards to its level of indebtedness and balancing the budget to ensure it can deliver sustainable local government services.

Comments approved by Allister Bannin, Director of Finance (Deputy s151 Officer).

8.2 LEGAL IMPLICATIONS

8.2.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Legal Services and Monitoring Officer that the Council is under a statutory duty to ensure that it maintains a balanced budget and to take any remedial action as required in year.

8.2.2 Section 28 of the Local Government Act 2003 provides that the Council is under a statutory duty to periodically conduct a budget monitoring exercise of its expenditure and income against the budget calculations during the financial year. If the monitoring establishes that the budgetary situation has deteriorated, the

Council must take such remedial action as it considers necessary to deal with any projected overspends. This could include action to reduce spending, income generation or other measures to bring budget pressures under control for the rest of the year. The Council must act reasonably and in accordance with its statutory duties and responsibilities when taking the necessary action to reduce the overspend.

8.2.3 In addition, the Council is required by section 151 of the Local Government Act 1972 to make arrangements for the proper administration of its financial affairs. The Council's Chief Finance Officer has established financial procedures to ensure the Council's proper financial administration. These include procedures for budgetary control. It is consistent with these arrangements for Cabinet to receive information about the revenue and capital budgets as set out in this report.

8.2.4 The monitoring of financial information is also a significant contributor to meeting the Council's Best Value legal duty and therefore this report also demonstrates compliance with that legal duty.

Comments approved by Sandra Herbert, Head of Litigation and Corporate Law and Deputy Monitoring Officer on behalf of the Director of Legal Services and Monitoring Officer.

8.3 HUMAN RESOURCES IMPLICATIONS

8.3.1 There are no immediate workforce implications as a result of the content of this report, albeit there is potential for a number of the proposals to have an impact on staffing. Any mitigation on budget implications that may have direct effect on staffing will be managed in accordance with relevant human resources policies and where necessary consultation with recognised trade unions.

8.3.2 The Council is aware that many staff may also be impacted by the increase in cost of living. Many staff are also Croydon residents and may seek support from the Council including via the cost of living hub on the intranet. The Council offers support through the Employee Assistant Programme (EAP) and staff may seek help via and be signposted to the EAP, the Guardians programme, and other appropriate sources of assistance and advice on the Council's intranet.

Comments approved by Dean Shoesmith, Chief People Officer.

8.4 EQUALITIES IMPLICATIONS

8.4.1 The Council has a statutory duty to comply with the provisions set out in the Sec 149 Equality Act 2010. The Council must therefore have due regard to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.

- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 8.4.2** In setting the Council's budget for 2023-2024, all savings proposals must complete an Equality Impact Assessment. As Officers deliver against the approved budget, including the savings within it, they will continue to monitor for any unanticipated equality impacts. If any impacts arise, officers will offer mitigation to minimise any unintended impact.
- 8.4.3** This report sets out a number of proposals that will change the services and provisions we provide for residents across Croydon. These proposals are subject to further work decisions.
- 8.4.4** The Council must, therefore, ensure that we have considered any equality implications. The Council has an established Equality Impact Assessment [EqIA] process, with clear guidance, templates and training for managers to use whenever new policies or services changes are being considered. This approach ensures that proposals are checked in relation to the impact on people with protected characteristics under Equality Act 2010.
- 8.4.5** Assessing the impact of proposed changes to policies, procedures, services and organisational change is not just something the law requires; it is a positive opportunity for the council to ensure it makes better decisions, based on robust evidence.
- 8.4.6** Our approach is to ensure the equality impact assessments are data led, using user information, demographic data and forecasts, as well as service specific data and national evidence to fully understand the impact of each savings proposal. This enables the Council to have proper regard to its statutory equality duties.
- 8.4.7** We have a large number of vulnerable children and asylum seekers who are in need of our services. We have also been faced with the rise of costs of the provision of adult social care, which has been exasperated following the pandemic. Alongside this our residents have been hit with the increased cost of living, we have supported residents by providing mitigation for changes where possible and signposting to other support organisations in the borough who can provide support. We will continue to seek mitigation during the equality analysis process where possible.
- 8.4.8** Our initial data suggests that residents across all equality characterises may be affected by changes. National and local data highlights that this may have a greater impact on race, disabilities, sex, pregnancy and maternity and age. We will

continue to assess the impact and strive to improve our evidence and data collection, to enable us to make informed decisions.

8.4.9 Where consultations take place, we will ensure that we make it accessible for all characteristics including those with disabilities including neurodiversity by ensuring that we adopt Disability standards in our consultation platform. Notwithstanding those residents who are digitally excluded. We will also consult using plain English to support our residents who do not have English as a first language.

8.4.10 With regard to potential staff redundancies, as a diverse borough we will undertake equality analysis and seek mitigation for staff by offering redeployment and employability support. We will also assess the impact of job losses on protected characteristics. We will also ensure that disabled staff are treated more favourably during restructure in that they will be required to meet the minimum standard prior to been offered an interview.

8.4.11 Research from existing EQIAs identifies that rising costs impact on some Disabled groups, communities from the Global Majority, African, Asian, African Caribbean households, young people, some people aged 15 – 64 and some people in the pregnancy/maternity characteristic . Research also indicates that there is an intersectional impact on young people from the Global Majority and both Disabled and Dual Heritage communities. Deprivation in borough is largely focused in the north and the east where the Global Majority of residents from the African, African Caribbean and Asian communities reside.

Comments approved by Denise McCausland, Equalities Programme Manager, Policy and Strategy.

9. APPENDICES

9.1 None.

10. BACKGROUND DOCUMENTS

10.1 None.

LONDON BOROUGH OF CROYDON

REPORT:	Streets & Environment Sub-Committee
DATE OF DECISION	11 July 2023
REPORT TITLE:	Consultation on the Local Flood Risk Management Strategy
CORPORATE DIRECTOR / DIRECTOR:	<p>Nick Hibberd - Corporate Director of Sustainable Communities, Regeneration & Economic Recovery</p> <p>Steve Iles - Director of Sustainable Communities</p>
LEAD OFFICER:	Steve Iles - Director of Sustainable Communities
LEAD MEMBER:	<p>Councillor Scott Roche Cabinet Member for Streets and Environment</p>
KEY DECISION?	No
CONTAINS EXEMPT INFORMATION?	No
WARDS AFFECTED:	All

1 SUMMARY OF REPORT

- 1.1** Under the Flood and Water Management Act 2010, Croydon Council as the Lead Local Flood Authority (LLFA) has a statutory requirement to have a Local Flood Risk Management Strategy (LFRMS). This current strategy was adopted in December 2015.
- 1.2** This report seeks to update scrutiny of the ongoing consultation with residents, local businesses, and other stakeholders on a draft strategy for Croydon. The strategy will outline the flood risk in Croydon and the council’s statutory responsibility as Lead Local Flood Authority (LLFA) to manage the risk of flooding from surface water, groundwater, and ordinary Watercourses.
- 1.3** The results of the ongoing consultation and feedback will be analysed. Based on the comments received, the final version of the Strategy will be presented to the Cabinet in December 2023. Upon adoption, the final plan will be published on our website.

2 Local Flood Risk Management Strategy

- 2.1** The slides at Appendix 3 outline the Local Flood Risk Management Strategy and our approach to the development of the draft document.
- 2.2** The Sub-Committee is asked to receive the presentation at the meeting on the 11 July 2023, and to provide feedback to officers for consideration in the development of the final Strategy document.

3 APPENDICES

- 3.1** Appendix 1 – Local Flood Risk Management Strategy (draft)
- 3.2** Appendix 2 – Draft Action Plan
- 3.3** Appendix 3 – Local Flood Risk Management Strategy – Public Consultation Slides

Local Flood Risk Management Strategy: 2023-2028

London Borough of Croydon

Draft Version 2

September 2022

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Foreword *PLEASE IGNORE* to be written by Croydon Council

1 – Understanding Flood Risk

1.1 Introduction

There are an estimated 5.2 million homes and businesses in England which are at risk of flooding, this directly effects communities, businesses, and infrastructure situated within the borough of Croydon. With the effects of climate change due to exacerbate flood risk within the UK, Croydon LLFA is committed to meeting the challenge posed by increased flood risk and is taking actions to make its community more resilient to future flood risk.

In 2020, during the UK’s wettest winter on record, Environment Agency flood schemes managed to protect 129,600 properties despite water levels being higher than the summer floods of 2007 where 55,000 properties flooded. The Environment Agency’s 2020 [National Flood and Coastal Erosion Risk Management Strategy](#) (FCERM) for England has three core ambitions regarding future risk and investment needs. These focus on climate resilience, sustainable investment decisions and developing local peoples understanding of flood risk to create a nation ready to respond and adapt to flooding change (Environment Agency, 2020). This Local Flood Risk Management Strategy (LFRMS) will provide a key tool to managing flood risk in Croydon whilst aligning with the new national strategy.

1.2 Flood Risk Management Requirements

As a Lead Local Flood Authority (LLFA), Croydon Council have a legal duty under The Flood and Water Management Act 2010 to develop, maintain, act, apply and monitor a LFRMS. The Act aims to reduce flood risk associated with increasingly extreme weather and climate change via local authority action. Furthermore, The Act requires flood Risk Management Authorities (RMAs) to contribute towards the achievement of sustainable development when exercising their flood risk management functions.

Table 1 below outlines these requirements and indicates where these are addressed in this Strategy.

The strategy must specify from The Flood and Water Management Act 2010 section 9 (4)	Covered in this strategy
(a)the RMAs in the authority's area,	Appendix B
(b)the flood and coastal erosion risk management functions that may be exercised by those authorities in relation to the area,	Appendix B
(c)the objectives for managing local flood risk (including any objectives included in the authority's flood risk management plan prepared in accordance with the Flood Risk Regulations 2009),	Section 2 - Objectives
(d)the measures proposed to achieve those objectives,	Section 2 - Objectives
(e)how and when the measures are expected to be implemented,	Section 2 and Appendix C
(f)the costs and benefits of those measures, and how they are to be paid for	Objective 1
(g)the assessment of local flood risk for the purpose of the strategy,	Section 1.4
(h)how and when the strategy is to be reviewed, and	Section 3

The strategy must specify from The Flood and Water Management Act 2010 section 9 (4)	Covered in this strategy
(i) how the strategy contributes to the achievement of wider environmental objectives.	Objective 5

Table 1 Requirements of the strategy

1.3 Roles and responsibilities for flood risk management

The Act recognises the following authorities as RMAs:

- LLFA i.e. Croydon Council
- The Environment Agency
- Water Companies i.e. Thames Water Utilities & Sutton and East Surrey Water (SES Water)
- Highways Authority i.e. Transport for London (TfL)

These RMAs have a duty to co-operate with each other when carrying out their flood risk management responsibilities.

The main RMAs within Croydon are Croydon Council as the LLFA, the Environment Agency which has a national and regional responsibility in coordinating flood risk management, SES Water and Thames Water as the water company and sewerage undertaker, and TfL as the Highways Authority. Developers and riparian owners also have a role to play in flood risk management. Riparian owners are responsible for the management and maintenance of main rivers and ordinary watercourses as they own the adjacent land and are therefore deemed to own the land up to the centre of the watercourse.

Appendix B shows the duties and powers upon specific RMAs and other authorities which are relevant to local flood risk management.

1.4 Assessment of flood risk

Signpost to Section 9 (4) requirements of The Act, this section deals with:

(g) the assessment of local flood risk for the purpose of strategy

This section sets out the assessment of local flood risk from main rivers, ordinary watercourses, surface water, groundwater and sewers and reservoirs as well as assessing risks associated with climate change.

Within the London borough of Croydon, there is no risk from tidal flooding, therefore this strategy will only focus on the sources of flooding listed above. Croydon's 2021 Strategic Flood Risk Assessment (SFRA) used modelling and analysis to predict the area's flood risk. The 2021 [SFRA](#) has been used to identify high risk areas, incorporating climate change and urbanisation. It also provides information on flood depths and velocities to assess the likely impact. SFRA's and LFRMS of neighbouring boroughs of Merton, Bromley, Sutton, Lambeth, Reigate and Banstead and Tandridge provide additional evidence of nearby risks which may affect Croydon. This information can be found on their respective council websites. The most up to date flood risk maps for Croydon can be found on the council website [here](#), these are also shown in Appendix E.

Section 19 reports, developed under the Flood and Water Management Act 2010, are the summary of investigations based on a specific flood event which outlines the details of the event, source(s) of the flooding and RMA responsibilities for its future management. Evidence gathered from Section 19 reports has been used throughout this section to highlight specific examples of historic flood events throughout Croydon.

Fluvial flood risk

Fluvial flooding occurs when river levels rise due to high quantities of or intense rainfall, resulting in rivers overflowing and bursting their banks. The Environment Agency define Main Rivers on their Main River Map and Croydon contains four of these main rivers; Wandle, Norbury Brook, Caterham Bourne and Chaffinch Brook. The Environment Agency is the risk management authority for main rivers. The Caterham Bourne main river led to significant flood events from January to March 2014 and throughout the winter of 2000-2001. During these events, high groundwater levels resulted in floodwaters receding exceptionally slowly. There are also records of several similar flood events throughout the 20th century when the Bourne was in flow. There are numerous incidents associated with the Norbury Brook from flood records dating back to the 1960s. These events were caused by overtopping in open sections and the surcharging of manholes and culverts in its culverted sections.

In 2021, the Environment Agency updated an existing dataset called the Risk of Flooding from Rivers and the Sea, which bands the risks into Low, Medium, and High categories. This dataset is readily available to the public to enable them to understand their own flood risk. This strategy uses the Environment Agency's Flood Map for Planning (Rivers and Sea) to determine future flood risk from rivers. This is used by Croydon Council as the Local Planning Authority (LPA), to make planning decisions in line with national legislation. The Environment Agency's most up to date Flood Map for Planning can be found on the [Environment Agency website here](#).

The 2021 Croydon [SFRA](#) shows that 97.8% of its area is identified as Flood Zone 1 (Low probability of flooding from rivers) with 1.7% defined as Flood Zone 2 (Medium probability), and less than 0.5% of

the area defined as Flood Zone 3a (High probability) and 3b (Functional Floodplain) (Croydon, 2021). According to the Environment Agency around 3% of all properties in Croydon are at risk of fluvial flooding, although 96% of these properties are in Flood Zone 1 where likelihood of flooding is low. In some cases, properties are protected by nearby flood defences as well as geological and topographic features (NEF, 2021) (Croydon Resilience Team, 2020). These flood defences within Croydon can be seen in **Error! Reference source not found.** Appendix E.

Flood Event Case Study

In August 2015, extremely high levels of rainfall (2.6% AEP (Annual Exceedance Probability)) caused significant flooding in the catchment of the River Wandle. In addition to surface water and sewer flooding, fluvial flooding played a large role in the source of this flood event (Croydon, 2016).

The River Wandle is a main river which runs through Wandle Park before entering a culvert and flowing into the neighbouring borough Sutton. During this event the River Wandle was reported to have burst its banks at multiple locations downstream, in Sutton. Despite not being within the area of Croydon, this indicates that the River Wandle was flowing at high levels and that this watercourse is capable of bursting its banks. Further details are outlined in the 24th August 2015 Section 19 Flood Investigation Report.



Figure 1 Purley Cross underpass (Croydon,2015)

Ordinary Watercourses flood risk

Ordinary watercourses are watercourses managed by the LLFA, these include all rivers, streams, ditches, drains, cuts, dykes, sewer (other than public sewer) and passages through which water flows, above ground or below ground or culverted. Whilst the Environment Agency are responsible for the management of main rivers, Croydon Council, as the LLFA, are responsible for the management of ordinary watercourses. **Error! Reference source not found.** Appendix E, shows the location of main rivers and ordinary watercourses within Croydon. Environment Agency records indicate that the mapped ordinary watercourses within Croydon, include the upstream section of Norbury Brook and the tip of the Beck, which flows into the neighbouring borough of Bromley. There are also several other ordinary watercourses which only flow when groundwater is high (Croydon, 2021).

Throughout Croydon, significant lengths of ordinary watercourse are culverted. These culverts have the potential to become blocked by debris and trash during periods of intense rainfall. This can restrict the flow of water through these watercourses, increasing the likelihood of localised flooding (Croydon, 2021). To reduce the likelihood of blockages, some culverts have trash screens at the inlet.

Flood Event Case Study

The Merstham Bourne, an ordinary watercourse near Coulsdon South Station, caused flooding to nearby residents' gardens in the winter of 2014. In January and February 2014, there was an increase of around 300% and 270% of the normal average rainfall for those months respectively. This event also caused disruptions to the nearby railway and nearby residents reported that lack of ditch and culvert maintenance led to the wider flooding of the area (Croydon, 2015). Specific details are outlined in the Merstham Bourne Flood Investigation Section 19 report.



Figure 2 Flooded gardens during 2014 event (Croydon, 2015)

Further asset information gathering and actions to address flooding from ordinary watercourses have been included in the action plan for this strategy to aid future management. These include actions focussed on clarifying riparian responsibility and mapping ordinary watercourses to better manage the associated risks.

Surface water and sewer flood risk

Surface water flooding is caused when intense rainfall creates surface runoff which flows over the ground and pools in low areas. This flooding occurs when the runoff exceeds the capacity of the existing drainage system. There are several areas which are particularly susceptible to surface water flooding. These include, Brighton Road up to Central Croydon via Purley and the A22 Godstone Road. **Error! Reference source not found.** Appendix E, shows these risks defined by the following risk levels:

- High Risk – Higher than 3.3% AEP
- Medium Risk – Between 1% and 3.3% AEP
- Low Risk – Between 0.1% and 1% AEP

Exceptionally high rainfall in August 2015 caused significant surface water flooding throughout Croydon. Short and intense periods of rain led to surface water runoff accumulating in low lying areas. The high intensity rainfall exceeded drainage capacity of road gullies and drain gratings. The rain gauge at Purley Cross recorded 56mm on the 24th August which almost exceeds the August monthly average rainfall for the area of 58.6mm (Croydon,2016). This event was determined to have a 2.63% AEP.

Surface water flooding can be managed by the use of Sustainable Urban Drainage Systems (SuDS) and landscaping to absorb and retain surface water, therefore minimising strain on the drainage system and sewers.

Sewer flooding is caused by the combined sewer and drainage network capacity being exceeded resulting in overflow from manholes. This may occur if the rainfall event overloads the capacity of the sewer and drainage system or if the network becomes obstructed by debris and sediment. Sewer flooding often results in localised short-term flooding. Historic sewer flood events can be seen in **Error! Reference source not found.** Appendix E.

Flood Event Case Study

In June 2016, a significant rainfall event caused surface water flooding in several locations in the River Wandle Catchment, predominantly in the south of Croydon and beyond. The flooding located at Caterham Drive was due to surface water and sewer flood sources. During the 7th June event, just under 1.5 times of the monthly average rainfall fell within 2 hours (Croydon, 2017).



Figure 4 Surface water flowing onto Sites Hill Road



Figure 3 Surcharging manhole on Caterham Drive

The sewer network in Caterham Drive is a separated sewer for foul water only. Surface water drains via a separate network of gullies and soakaways within the highway. A survey conducted by Thames Water following this event found that there was spare capacity within the foul network in this area, however, surface water entered the foul system resulting in overcapacity. The surface water may have entered the sewer network for a variety of reasons including direct surface water ingress into the foul water network and/or accumulated permitted and non-permitted connections over the years (Croydon, 2017).

The surface water drainage network also reached capacity during this event causing surcharged highways drains and manholes. This suggests a network capacity issue, likely exacerbated by increasing demand and development throughout Croydon. For the last 65 years there has been a separated sewer system, however, the effectiveness of this system has been compromised due to misconnections. This makes it increasingly difficult for authorities to determine the capacity of the network. Furthermore, impermeable surfaces in the area have increased in recent years. This increases the surface water runoff to low-lying areas like Caterham Drive and therefore increases pressure on the drainage network.

As the sewerage undertaker, Thames Water are responsible for the management of sewer flooding although it is usually difficult to distinguish from surface water flooding. Croydon LLFA is working with Thames Water to identify flooding hotspots and system capacity issues. The risk from sewer flooding in Croydon remains relatively low as Croydon is mainly served by separate foul and surface water sewers instead of a combined system. However, due to an increase in rainfall intensity and development, we may see a rise in sewer flood events in the future. The new Thames Water [Drainage and Wastewater Management Plan](#) sets out how wastewater systems and drainage networks will be improved and extended to ensure resilience against future pressures for the next 25 years.

Groundwater flood risk

Groundwater flooding often occurs after long periods of sustained high rainfall as a result of water rising up from underlying aquifers or springs. Groundwater flood events have been reported in Croydon, with regular hotspots primarily appearing on the land along the Caterham Bourne, Brighton Road and up to Norbury Brook (Croydon,2021). These events are often highly localised, usually affecting basements and gardens. In the south of the borough, the chalk geology increases groundwater flooding vulnerability on a larger scale through valley routes through Kenley, Purley and Coulsdon. Susceptibility to groundwater flooding throughout Croydon can be seen in **Error! Reference source not found.** Appendix E.

Groundwater flooding is difficult to predict as it may occur several days or weeks after heavy rainfall events and when river levels have receded. Existing groundwater monitoring takes place in boreholes which are placed in areas known to be at risk. This system can give notice days or weeks in advance of flood events. This early warning can be used to alert authorities, therefore allowing them to plan their response to potential groundwater flooding. There are measures that can be implemented to stop or minimise groundwater flooding but have varying degrees of effectiveness.

The Croydon Surface Water Management Plan (SWMP) used a dataset derived from British Geological Survey, Environment Agency, and Defra groundwater datasets to create **Error! Reference source not found.** Appendix E. This map identifies areas where there is increased potential for groundwater to rise within 2m of ground level after periods of above average recharge.

Other sources of flood risk

Artificial flood risk sources and water bodies are not covered within the above categories, this typically includes reservoirs, canals and lakes. Croydon contains South Norwood Lake, an open reservoir located next to Bromley, and Russel Hill, which is a covered reservoir managed by Thames Water in the West of the borough. To date, there has been no recorded incidents of reservoir flooding within Croydon and the last recorded fatality linked to reservoir flooding in the whole of the UK was in 1925.

In 2021, the Environment Agency updated their reservoir flood maps which can be found [here](#). This tool can be used to show where water is likely to go in the event of a dam or reservoir failure. An extract from this tool has been included in **Error! Reference source not found.** Appendix E to show the flood risk from South Norwood Lake and Russel Hill Reservoir. **Error! Reference source not found.** Appendix E, shows that if the Russel Hill Reservoir were to fail it would impact areas of West Croydon and Waddon veering west to follow the course of the River Wandle. The failure of South Norwood Lake would lead to flooding primarily in the London borough of Bromley, affecting areas of Penge, Elmers End and Beckenham.

Under the Reservoirs Act 1975, all large reservoirs must be inspected annually, supervised by a reservoir panel engineer. Croydon LLFA own and manage South Norwood Lake and are therefore responsible for ensuring that inspections are carried out by a qualified panel engineer and that necessary safety work is completed to reduce the likelihood of a failure.

2 - Objectives

Signpost to Section 9 (4) requirements of The Act, this section deals with:

(c) the objectives for managing local flood risk (including any objectives included in the authority's flood risk management plan prepared in accordance with the Flood Risk Regulations 2009)

(d) the measures proposed to achieve the objectives

The sources of flooding that carry the most significant risk within Croydon are considered to be surface water and groundwater flooding. High profile instances of groundwater flooding have been associated with the Caterham Bourne in the south of the borough. The area's most susceptible to surface water flooding are Brighton Road and Purley. These events threaten a significant number of homes, businesses and transport infrastructure as well as exacerbating other sources of flooding. The following objectives for managing flood risk aim to reduce the risk and impact of flooding within Croydon (Croydon,2021).

These objectives have been developed in line with the National FCERM Strategy for England. Each objective in this section will be achieved via its accompanying measures and actions which have been developed in line with the recent 2021 SFRA findings outlined in section one of this strategy.

The National Strategy is centred around 3 long-term ambitions which are based on future risk and investment needs to ensure resilience to the year 2100. These 3 core principles are:

- **Climate resilient places:** working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change.
- **Today's growth and infrastructure resilient in tomorrow's climate:** making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as infrastructure resilient to flooding and coastal change.
- **A nation ready to respond and adapt to flooding and coastal change:** ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action.

These core principles have been carried through each of the following 7 objectives within this strategy.

Objective 1

Identify investment and funding opportunities to develop and deliver a programme of flood alleviation schemes which will take forward innovative actions that help to bolster resilience to flooding and climate change.

Local flood risk management requires funding and resources from many different sources. To date, the primary funding sources have been provided through the central government. With pressures building on government funding in today's economic climate, there is a greater need for LLFAs to finance local flood risk management activities and schemes from their own funding or to find

alternative sources. Effective flood risk management requires new ways of working and funding based on collaboration across partner organisations to maximise investment return.

There are many ways in which central government funding can contribute towards local flood risk management, these are summarised in Figure 5 below.

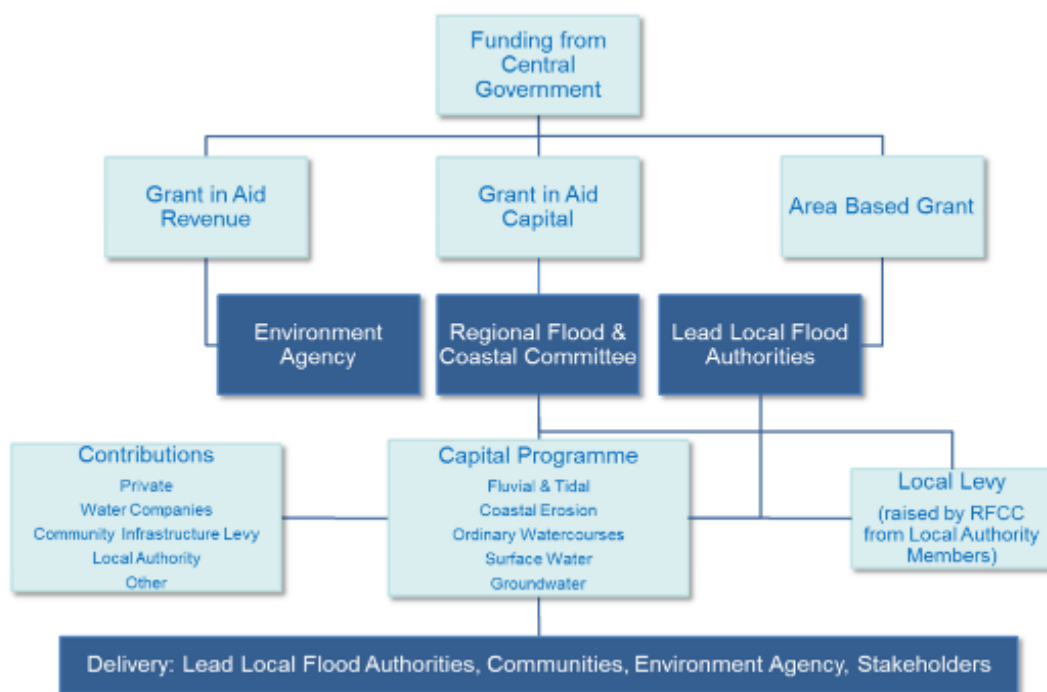


Figure 5 Summary of LLFA Funding streams

Details of the allocation of Government funding to Croydon LLFA can be seen in Table 2.

Financial Year	Approximate Grant Allocation
2016/17	£217.5K
2017/18	£230K
2018/19	£235K
2019/20	£249K
2020/21	£267.5K
2021/22	£565K*
2022/23	£435K*

Table 2 Defra funding allocation for LLFA duties to Croydon Council (*partially funded by Defra: combination of grant and LBC capital funding)

It may be possible to fund some schemes using government funding alone, however, most projects will require multiple sources of funding to reach the required sum. Flood risk management projects are primarily funded by the following funding sources:

- National Government Funding – FCERM Grant in Aid (GiA)
- Regional funding – Local levy
- Local, Partnership and other funding (Organisations, Businesses, Borough & Parish Councils, residents)

FCERM GiA funding is the central government funding which is specifically for flood defence projects throughout England and it is administered by the Environment Agency on behalf of Defra. If the FCERM GiA funding doesn't cover the entire cost of the project, extra money can be raised through Partnership Funding. Partners can be anyone who benefit from an FCERM project such as; local businesses, residents and developers. The Environment Agency released the updated [Partnership Funding Calculator](#) tool in 2021 to help to estimate how much FCERM GiA funding a project is eligible for.

As the LLFA, Croydon Council are responsible for coordinating with other RMAs to address local flood risk. For example, Croydon LLFA engage with Thames Water who are responsible for upgrading the sewerage network to account for the effects of climate change and to prevent sewer flooding whilst also helping manage surface water flooding. Coordination with utility companies and property owners is also essential for local flood risk alleviation and resilience. If property owners and businesses benefit from a flood risk management project, they will be encouraged to provide a contribution. Furthermore, developers are responsible for managing flood risks in their building and landscaping design.

Croydon LLFA will capitalise on what has been achieved so far and will continue to learn lessons as highlighted in the case studies below. They will continue to improve the borough-wide understanding of current and future flood risk and use this to inform and prioritise a programme of flood alleviation schemes.

Croydon LLFA will look at innovative solutions that help to bolster resilience to flooding and climate change, identifying opportunities to achieve environmental net gain through de-culverting, natural catchment management and other measures. This will be done whilst exploring options to reduce the carbon footprint and environmental impact during the design, build and maintenance of flood alleviation schemes.

Croydon LLFA will explore opportunities to support the Infrastructure Delivery Plan by providing progress on various schemes that involve S106 and Community Infrastructure Levy (CIL).

This objective pays particular attention to the [National Strategy](#) target of 'making the right investment to secure sustainable growth and environmental improvements, as well as infrastructure resilient to flooding' (Environment Agency, 2020).

Funding Case Studies

GiA and Local Levy - Kenley Flood Alleviation Scheme – In April 2013, the Thames RFCC approved the first stage of a funding application (through FCERM GiA) to address long-standing localised surface water flooding problems in the Welcomes Road / Kenley Lane area of Kenley. A consultant was procured to carry out the first stage of refined modelling of the area alongside stakeholder engagement with local residents to develop an evidence base for detailed design of flood alleviation options in the area. Small scale drainage interventions which had the potential to reduce the frequency and impact of flooding at Kenley Lane without increasing risk to properties in Station Road were identified and these are programmed to be implemented by March 2023.

DEFRA Funding - Surface Water Modelling & Mapping – In November 2019, Croydon LLFA secured DEFRA funding to undertake detailed and up-to-date surface water modelling for two Critical Drainage

Areas (i.e. Caterham Drive and Purley Cross to River Wandle), for the purpose of updating the Environment Agency Risk of flooding from Surface Water (RoFSW) Mapping as part of the Boosting Action for Surface Water Programme. A consultant was procured to deliver the project and developed a detailed and integrated 1D-2D hydraulic model of the catchment to provide the necessary resolution and confidence in the prediction of flood depths and extent, commensurate with the requirements for the Environment Agency RoFSW. The project was completed and the outputs delivered to the Environment Agency in July 2020.

Council Funding - Flood Hotspot Alleviation Schemes – This is an ongoing programme which involves investigating the flooding mechanism in known flood hotspots within the borough and identifying viable small-scale interventions that could be implemented to alleviate the flooding or better manage the risks of flooding. These are flooding incidents that would not normally comply with the requirements of the FCERM GiA or Local Levy funding and are therefore funded from the capital budget provided by the Council for flood and water management activities. In 2022, flood alleviation works were completed in Lower Barn Road, Palace Green, Upper Shirley Road, Calley Down Crescent, Wolsey Crescent, with works programmed to be completed in Kenley Lane/Welcomes Road, King Henrys Drive, Norbury Crescent, Asmar Close and many more sites.

Measures

Measure 1: Continue to improve the borough-wide understanding of current and future flood risk, including the likelihood and consequences, and inform the prioritisation of flood alleviation schemes.

We will review and update the Surface Water Management Plan and Strategic Flood Risk Assessment using the newest available data. Furthermore, we will continue to undertake flood alleviation studies and prioritise alleviation schemes based on these and our understanding of current and future flood risk.

Measure 2: Develop a funding strategy which identifies investment and funding opportunities to develop and deliver a programme of flood alleviation schemes.

Croydon will monitor and update funding streams for flood alleviation measures to prioritise opportunities. We will also submit a business case for capital funding to implement small interventions and support the Infrastructure Delivery Plan by providing progress on schemes which involve S106 and CIL money.

Measure 3: Identify opportunities to achieve environmental net gain through de-culverting, natural catchment management and other measures.

Croydon will generate a list of potential locations for de-culverting as well as assessing and identifying the multiple benefits of de-culverting in these locations.

Measure 4: Explore options to reduce carbon footprint and environmental impact in the design, building and maintenance of flood alleviation schemes.

Council teams will be encouraged to attend the Environment Agency carbon calculator and reporting training to gain an understanding of our current footprint. Using this, we will be able to consider the

carbon footprint and environmental impact during all stages of a scheme and be able to realise the council's aspirations with regards to carbon reduction.

Measure 5: Identify innovative solutions that help to bolster resilience to flooding and climate change.

To achieve this, we will investigate and form a list of innovative solutions which will help to increase resilience to flooding and climate change within Croydon.

Measure 6: Investigate benefits and costs of different resilience actions and property level protections that could be effective in Croydon.

Croydon will collate a list of resilience actions and property level protection that could be effective in Croydon and perform cost benefit analysis on these actions. Following this, we will raise awareness of the different resilience actions and the outcome of our analysis.

Objective 2

New developments and regulated activities will contribute to making places more resilient to flooding using Nature Based Solutions where possible and achieving environmental net gain, today and in the future.

As well as managing existing flood risks, Croydon LLFA has a responsibility to ensure that new developments do not contribute to further flood risk. Since the Croydon 2015 LFRMS, work has been done both locally and nationally to tackle flood risk through planning. For example Policy DM25: Sustainable Drainage Systems and Reducing Flood Risk, has been introduced as part of the Croydon [Local Plan](#) adopted in February 2018. The Local Plan states that developments should not increase the risk of flooding and that sustainable drainage systems should be prioritised (Croydon, 2021).

[The London Plan](#) also aligns with the idea of using Nature Based Solutions and achieving Environmental Net Gain within new developments. London Plan Policy 13 on Sustainable Infrastructure, states that development proposals should prioritise sustainable drainage and that this drainage should be designed to promote multiple benefits such as enhancing biodiversity and urban greening (Greater London Authority, 2021).

The [National Planning Policy Framework](#) (NPPF), provides Government guidance on Planning. The primary focus of this framework is to take full account of flood risk and to avoid developments increasing flood risk elsewhere and in the future. Importantly, this guidance highlights making use of natural flood management as an approach to flood risk management, safeguarding land that is or may be required for flood risk management and encouraging policies which consider cumulative flooding impacts in a more holistic approach (Department for Levelling Up, Housing and Communities, 2021).

The NPPF also encourages Planning Authorities to incorporate sustainable drainage systems to ensure future resilience. The Local Plan is now under review and changes to the NPPF will be reflected in the revised policies. This offers an opportunity to maintain focus on using Nature Based Solution, such as SuDS, to make Croydon more resilient to flooding now and in the future, and to implement the national guidance and the objectives stated in this LFRMS.

This objective will contribute to the [National Strategy](#) long term ambition to ensure that ‘today’s growth and infrastructure is resilient to tomorrow’s climate’ (Environment Agency, 2020). As the local effects of climate change are uncertain, localised research is needed to greater understand the impacts of climate change (See section on **Climate Change**). Sustainable development and drainage must be prioritised throughout the planning process in order to adapt to the effects of climate change and manage the increasing future flood risks.

Since the 2015 LFRMS, Croydon LLFA have identified additional resources to process SuDS applications as part of planning applications, reviewed workforce to meet SuDS obligations and created stronger ties between neighbouring boroughs by sharing their processes with the Southwest London Flood Group.

Sustainable Drainage Systems

Sustainable drainage systems (SuDS) provide a more natural approach to water management. They increase the resilience of drainage systems by controlling the rate and quantity of surface water runoff, therefore decreasing the impact of storm events on existing infrastructure. SuDS also have additional benefits such as improving water quality, providing green spaces and increased biodiversity. The higher levels of surface water runoff which are generated by new development and the associated increase of impermeable areas can be reduced by providing SuDS. This ensures that new development does not increase the flood risk of the surrounding area. Some examples of SuDs include soakaways, swales, green roofs, permeable paving, rainwater harvesting and detention basins.

Strategic Policy 6.4 in the Local Plan requires all developments, including refurbishments and conversions, to utilise SuDs to reduce surface run-off and to provide water treatment on site (Croydon, 2021). Croydon LLFA will work with partners and developers through the development management process to work towards provision of SuDS to fulfil the requirements of the Act.

Guidance for designing SuDS can be found within the [CIRIA SuDS Manual](#) and Defra’s [non-statutory technical standards for sustainable drainage systems](#). Croydon LLFA promotes its own SuDS guidance via its 2018 [Sustainable Drainage Design and Evaluation Guide](#). This guide is intended for developers and SuDS designers.

As an LPA, Croydon LLFA is expected to ensure that planning policies and decisions include SuDS for the management of run off, unless demonstrated to be inappropriate. As the LPA and LLFA, Croydon LLFA must also ensure that SuDS are operated to appropriate standards and that they are maintained throughout the lifetime of the development.

Developers who implement SuDS must provide evidence that their drainage systems do not increase groundwater levels and subsequent flood risk on or off site. This is particularly important for developments working within areas prone to groundwater flooding, as shown in **Error! Reference source not found.** Appendix E.

Measures

Measure 1: Ensure appropriate guidance for developers is available to make places more resilient, use Nature Based Solutions, achieve environmental net gain and promoting retrofitting SuDS.

We will review and update planning advice for major and minor developments to incorporate a list of appropriate nature-based solutions that will be effective to use in Croydon. In addition, we will develop specific SuDS related cost guidance and increase the awareness of these sustainable practice's borough wide.

Measure 2: Continue to monitor the risk of individual and cumulative flood risk to and from developments and review ways to facilitate more sustainable design and post-construction changes.

We will identify ways to increase awareness of flood risk to owners of developments and improve our understanding of flood risk to and from developments, in order to inform required changes to planning policy and guidance documents.

Measure 3: Ensure the technical review of SuDS applications including the use of Nature Based Solutions as part of the LLFA Statutory Consultee Role for planning applications.

We will quantify the resources needed to assess drainage strategies and flood risk assessments submitted as part of planning applications and provide the training needed to do so.

Measure 4: Monitor and record planning application against SuDS Hierarchy to ensure that nature-based solutions are prioritised.

We will develop a tracking system to monitor the number of applications for major and minor developments.

Measure 5: Continuous working with the Environment Agency, other partners, and other bodies (such as Association of Directors of Environment Economy Planning & Transport, Town and Country Planning Association and the Royal Town Planning Institute) to develop the planning skills and capabilities.

We will collaborate with our partners to develop and share good practice and knowledge including utilising national sources of information and guidance.

Measure 6: Identify and promote development-related funding mechanisms to support the delivery of flood alleviation schemes.

We will collate a list of potential developments to seek funding and explore how S106 agreement funding can be utilised to deliver flood alleviation schemes. The Infrastructure Delivery Plan will be updated annually with the progress on various schemes that involve S106 and CIL money.

Objective 3

Develop and implement best practice for recording, inspecting, and managing flood assets, considering the changing environment.

This objective focusses on the [National Strategy](#) Objective A to have the flood data and information available and accessible so assets can be managed effectively and efficiently and to help inform decisions made by RMAs (Environment Agency, 2020).

Data collection and the effective sharing of information is essential to the management of flood risk. Data should be collected and input to a common data environment which is stored and maintained properly. This data can then be easily analysed and manipulated within the corporate GIS system. Within Croydon, data is gathered in many ways for example, inspections, studies, and Section 19 reports when investigating flood incidents. Using robust data management, Croydon will be able to better manage assets and share knowledge both within Croydon and with its neighbouring boroughs.

In addition to the better management of existing assets, data management supports flood risk management by informing guidance such as the installation and maintenance of innovative flood management techniques. In 2019, Croydon collated all asset information into one system and with a target to use more sustainable drainage methods going forwards, a list of suitable SuDS systems will also be included. Highways drainage assets are also due to be added to the system.

Managing Highways Drainage assets

Highways drainage assets within Croydon are maintained via three methods; cleansing, repairing and pumping.

CLEANSING

- There is a cyclical gully cleansing programme in place where all road gullies are inspected/cleaned once a year (or 4 times a year in areas susceptible to flooding). Recently, we have included all linear drainage systems and footpath gullies to the programme. Gullies and linear drainage systems are also inspected/cleaned on an ad-hoc basis should they become blocked before they are due to be inspected/cleaned on the cyclical programme.
- There is a soakaway cleansing programme in place where all soakaways are cleaned/jetted once every 5 years (or more frequently in areas susceptible to flooding). Soakaways are also cleaned/jetted on an ad-hoc basis if there is a need to do so (i.e. after a flooding event).
- All other drainage assets (i.e. trash screen, ditch, culvert etc) are inspected/cleaned on an ad-hoc basis, mainly when a severe weather warning is issued by the Met Office.

REPAIRING

- Drainage assets that are identified as defective during the cleansing programmes are placed onto a repair programme where the defect is investigated, and repair works carried out as necessary.

PUMPING

- There is an inspection programme in place where general mechanical/electrical inspections and testing of all pumping stations owned by the Council are undertaken 4 times a year.

As a LLFA, Croydon Council have a duty to respond to and investigate significant flood events. For flood resilience to be maximised, local residents and communities must be informed and engaged in flood awareness and riparian owner responsibility. During a severe flood event, Croydon LLFA works with RMAs, the EA, emergency services and local flood action groups to coordinate a response. Appendix E – Croydon flood risk maps contains maps which indicate flood risk in Croydon from the latest SFRA.

As an Open Data organisation, the Environment Agency makes its data readily available and free of charge. Environment Agency open data resources such as the [Flood Map for Planning](#) are incredibly valuable tools for Croydon to use and we aim to create similar open data sources for our neighbouring boroughs to use. Surface water and groundwater flood maps of Croydon are also published on the Council website and can be found [here](#). Since the 2015 LFRMS, Croydon LLFA has improved its external collaboration by attending quarterly South West London Flood Group meetings and reporting progress to the RFCC representatives.

Flood investigation

Signpost to Section 19 of The Act: As a Lead Local Flood Authority Croydon Council have a responsibility to investigate certain flood incidents.

Local authorities: investigations

(1) On becoming aware of a flood in its area, a lead local flood authority must, to the extent that it considers it necessary or appropriate, investigate—

(a) which risk management authorities have relevant flood risk management functions, and

(b) whether each of those risk management authorities has exercised, or is proposing to exercise, those functions in response to the flood.

(2) Where an authority carries out an investigation under subsection (1) it must—

(a) publish the results of its investigation, and

(b) notify any relevant risk management authorities.

As outlined in the [London Borough of Croydon Flood Investigation Protocol](#), investigations of flood events under Section 19 of the Act will be considered by Croydon LLFA for events which meet the criteria below:

Formal investigation:

- Fatality or serious injury as a direct result of flooding
- 3 or more residential properties flooded

Formal investigation likely:

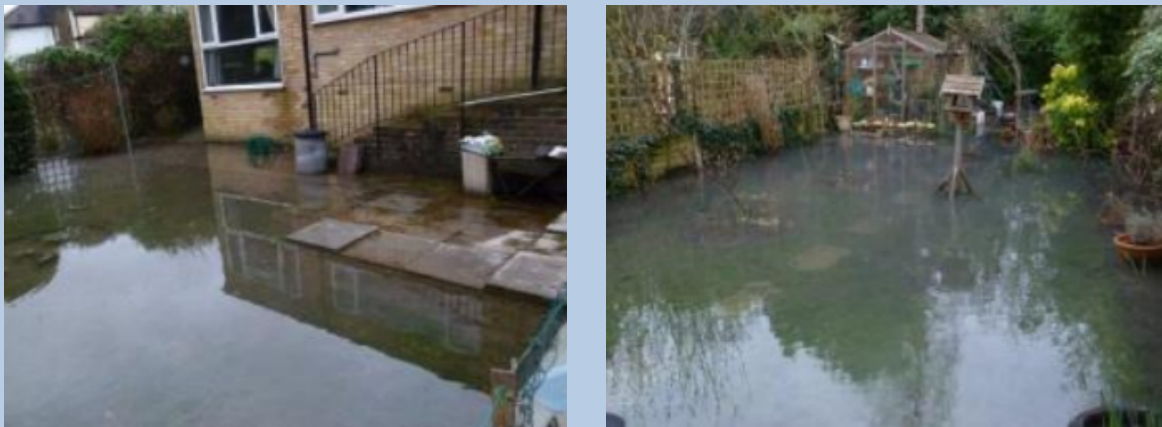
- Depth greater than 0.10m over ground floor
- Critical infrastructure affected for more than 2 hours

- Internal flooding at a facility supporting vulnerable communities
- 3 or more commercial properties flooded
- Lasting effect on local environment and/or biodiversity
- Recurring incident (occurred at least 3 times in last 6 months)
- Requests for formal investigation from the public

Case study

In January 2014, high levels of rainfall caused groundwater levels in the Merstham Bourne area to rise rapidly. Whilst there were other contributing flood types such as surface and sewer flooding, groundwater was the predominant source of flooding during this event.

The groundwater in the underlying chalk geology rose to exceptionally high levels as a direct result of prolonged rainfall throughout the month. This led to the emergence of springs in the area, causing bournes to flow in Croydon. Furthermore, high groundwater levels led to the exacerbation of other flood types. For instance, surface water flooding was made worse by the lack of infiltration due to saturated soil from high groundwater levels. Fluvial flooding was also worsened as Merstham Bourne only flows at times of high groundwater level. The Section 19 report documented this flood event in detail and Croydon are able to use this to better manage flood risks in the future. The report investigated the effectiveness of the relevant RMAs and provided future recommendations as well as lessons learnt. In 2019, Croydon LLFA collated all asset information into one system to develop a comprehensive picture of their assets and associated flood risk.



*Figure 6 Flooded Gardens from Merstham Bourne
(Croydon 2015)*

The early 2014 flood events and the consequent emergency response led to successful internal collaboration between Croydon LLFA and various authorities as reported in the [Caterham Bourne Flood Investigation](#) (Croydon Council, 2014). The flood event saw the formation of the Caterham Bourne Project Board which consisted of officers from Croydon, Surrey, Tandridge, Environment Agency, Thames Water and SES Water, who collectively were responsible for overseeing delivery of the Caterham Bourne Flood Alleviation Study. The Croydon Resilience Forum (CRF) are a group of multi-agency responders who provide a forum for an integrated and coordinated approach to

emergencies and potential risks throughout the borough. In 2020, the CRF created the [Multi-Agency Flood Response Guidance](#) which highlights the importance of data collection for example when a property or business is flooded to assist with flood warning work and defence operation.

Measures

Measure 1: Invest in developing and improving in-house information management to enable knowledge sharing between the different teams and externally

To achieve this, Croydon will collate all assets onto a single system and map all flood assets including ordinary watercourses on the corporate GIS system. We will also ensure that up to date flood maps and data are available and accessible to all users. In addition to this, we will improve inter-team collaboration for communicating flood issues in the borough with residents.

Measure 2: Raise profile and understanding of groundwater as a flood risk.

Croydon will develop a strategy for groundwater management within the borough and improve groundwater information on the council website in addition to developing an information leaflet for residents and businesses to raise awareness. This proactive response will be furthered by exploring the possibility of installing and monitoring boreholes in areas which are susceptible to groundwater flooding.

Measure 3: Collate and develop guidance on costs of installing and maintaining different SuDS types.

Croydon will raise awareness of the existing SuDS Design and Evaluation Guide as well as compiling a list of suitable SuDS systems and promoting their use on council schemes.

Measure 4: Develop a programme to assess the effectiveness and working conditions of all the Council's existing drainage infrastructure and put in place a robust maintenance/renewal programme that will ensure that the risk of flooding is reduced.

Croydon will review and improve existing gully cleansing programme to target the most silted areas. Croydon will also develop a maintenance programme for the footpath gullies and linear drainage assets within the borough as well as exploring the possibility of installing silt/water level monitoring sensors in hotspot areas.

Measure 5: Investigate flood events to understand their source and impacts and apply the learning to inform the Council's and other RMAs' flood management procedures.

Through carrying out many successful Section 19 reports, Croydon have been able to generate a better understanding of flood risk within the area. Croydon will continue carrying out Section 19 reports where appropriate and updating the flood incident register with new information. Croydon will also review and update the existing flood investigation protocol.

Objective 4

We will communicate effectively with infrastructure owners, businesses, and the community to ensure they understand the potential impact of flooding on their lives and livelihoods. They will therefore be better prepared to respond to flooding and will take action to make their properties more resilient to flooding and climate change.

This objective aligns with the [National Strategy](#) ambition to create a nation ready to respond and adapt to flooding through effective communication so that the Council, its partners, and the community can be better prepared and can increase resilience. Strategic objective 3.1 in the [National Strategy](#) focusses on effectively communicating the risks and consequences of flooding to communities and businesses (Environment Agency, 2020). In recent years, Croydon has been building strong relationships both internally between council departments, externally with its partners (Environment Agency, LLFA, Thames Water, TfL) and with the wider community.

Case study

In June 2022, the Mayor of London launched a flood awareness leaflet which was produced with inputs from local authorities. The leaflet was designed to help London residents with basement properties prepare for flash floods. The leaflet can be viewed by visiting [London.gov.uk/flash-flooding](https://london.gov.uk/flash-flooding).

Other documents such as the [LBC Riparian Owner Leaflet](#) provide the local community with information surrounding riparian responsibility to act as a flood risk management guide. This document summarises the roles and responsibilities for riparian owners in a way which is easily understandable (Croydon,2017). Furthermore, since 2015, Croydon has continued to encourage residents to sign up to the flood alert service through the flood responsibility [webpage](#) to ensure residents safety and encourage flood risk initiative within the community.

Croydon will ensure that all infrastructure and properties are more resilient to flooding and climate change, through fostering collaboration, effective communication and knowledge sharing.

To do so, Croydon will work with the other RMAs to:

- Identify areas within the borough which are at significant risk of flooding from combined sources.
- Understand how the assets are managed and maintained and identify common actions which could reduce the risk of flooding.
- Review asset records and agree ownership.

Croydon LLFA will work with Emergency planning to:

- Review existing emergency procedures and identify actions to take forward.
- Support the Emergency Resilience Team in developing flood plans.
- Undertake regular reviews of the flood plans to ensure they are fit for purpose, including undertaking regular drills to test them and update as necessary.

As part of the wider community engagement Croydon will:

- Support flood action groups and residents' association meetings.
- Expand the information available on the council website and available advice and guidance.
- Encourage residents and businesses to sign up to the Environment Agency flood warning service.
- Compile a list of flood alleviation initiatives that residents/businesses could implement privately or with wider support.

- Undertake regular surveys of watercourses to identify riparian owners, providing them adequate information about riparian owner responsibilities on the website and during flood action group/residents association meeting, and ensuring they understand their maintenance responsibilities.

Flood Response

Croydon LLFA will implement appropriate measures to mitigate any devastation caused by the event and to manage risk. These may include but are not limited to:

- Establishing temporary shelters and housing for evacuated persons
- Flood barrier construction and sandbagging
- Establish transport diversion plan to keep motorists away from flood waters
- Establish effective communication networks (website, Facebook, Twitter)
- Regular rainfall, river, groundwater and soil moisture monitoring
- Enabling over pumping to maintain water and sewer services
- Work with utility companies to prioritise protection of key infrastructure

After the flood event, Croydon LLFA will work with its partners to ensure normality is restored and that people, services and businesses that were affected by the event are able to recover as soon as possible. Croydon LLFA will investigate the causes of the flooding, lessons learned and form a proposal for potential changes such as:

- Altering flood plans
- Improving riparian owners' awareness of responsibility
- Improving communication with public surrounding property level resilience
- Identifying ways to reduce future flood risk
- Increasing maintenance operations
- Communicating risks with other RMAs

Measures

Measure 1: Review effectiveness of emergency procedures and ensure our capabilities are known throughout the council and our commissioned services.

To achieve this, Croydon will review existing emergency procedures and identify actions to take forward as well as circulating the emergency procedures with relevant teams.

Measure 2: Regularly liaise with Network Rail, Thames Water and other infrastructure owners to discuss areas where their infrastructure falls in Croydon's flood hotspots.

Croydon will engage with Network Rail, TfL and Thames Water to find solutions to the problems identified in the action plan. Furthermore, Croydon will identify and collate other problem areas within the borough relating to Network Rail and Thames Water assets and invite their representatives to the internal flood group meetings for further discussions.

Measure 3: Engaging with the public and improving digital communication to encourage resident led initiatives and provide an efficient warning system.

Croydon will expand the information available on the council website and make it more accessible and user friendly. Residents and businesses will be encouraged to sign up to the Environment Agency warning service and advice will be provided on how they could implement flood alleviation initiatives privately or community wide.

Measure 4: Identify riparian owners and raise awareness of their responsibilities.

Croydon will engage with owners of properties near watercourses to ensure they understand their maintenance responsibilities. Riparian owner responsibilities will also be promoted at flood action group and resident association meetings. Regular inspections will be undertaken to ensure adequate maintenance of channels and trash screens has been carried out.

Measure 5: Develop flood plans that better coordinate preparing and responding to incidents.

Croydon LLFA will liaise with the Emergency Resilience Team to develop flood plans and undertake regular reviews to ensure they are fit for purpose. Regular drills will also be undertaken to test the effectiveness of the plans and necessary adjustments will be made.

Objective 5

Enable sustainable growth by taking account of social, economic, environmental and flood risk opportunities and challenges.

Signpost to Section 9 (4) requirements of The Act, this section deals with:

- (i) *how the strategy contributes to the achievement of wider environmental objectives.*

Sustainable growth is essential for the longevity and prosperity of the borough. This includes many elements such as new homes, jobs, infrastructure, education, and health. With an increasing population, there is a current need for over 41,580 new homes alone in Croydon by 2039 (Croydon, 2021). The 2021 Local Plan Strategic Policy 1.0D states that Croydon Council will support developments which can achieve sustainable growth while protecting and enhancing the borough's natural environment and built heritage. This strongly aligns with the [National Strategy](#) objectives of enabling sustainable growth in the right places, contributing to job creation, attract funding and providing resilient and sustainable infrastructure.

Since the previous strategy, Croydon LLFA adopted the Drainage Hierarchy as defined in the 2021 [London Plan](#). This has also been incorporated into the Croydon SFRA and [new developers guidance](#). A submission criteria document for developers submitting planning applications was finalised and published in 2019. This [Advice to Planning Applicants](#) document contains the requirements of the Drainage Strategy which should be submitted to support all major planning applications. Sustainable drainage systems are now required in all development and should meet the following requirements (Croydon, 2021):

- Ensure surface run-off is managed as close to the source as possible;
- Accord with the London Plan Sustainable Drainage Hierarchy;
- Achieve better than greenfield runoff rates;

- Be designed to be multifunctional and incorporate sustainable drainage into landscaping and public realm to provide opportunities to improve amenity and biodiversity;
- Achieve improvements in water quality through a sustainable drainage system management train; and
- Be designed with consideration of future maintenance.

The [Level 2 SFRA](#) provides an assessment of specific development sites and recommends measures involving SuDS to mitigate any identified flood risk in these sites.

Sustainability Assessment (SA)

The SA evaluates the impact that the Local Plan will have on wider sustainability objectives. SA is the process which identifies and evaluates social, environmental, and economic objectives for the area in order to fulfil the requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations which transpose EU Strategic Environmental Assessment into national law. The SA was used during the preparation of this strategy to evaluate options for achieving the flood risk objectives against wider sustainability objectives.

The following topics included in the [2022 SA](#) have influenced this strategy:

- | | | |
|------------------------------------|-----------------------------|-----------------|
| -Air Quality | -Health | -Water |
| -Biodiversity | -Heritage | -Transport |
| -Climate Adaptation and Mitigation | -Housing | -Land and Soils |
| -Economy and employment | -Population and communities | - Landscape |

The SA shows that Croydon Council’s Plan is expected to have a positive impact on the environment in both the short and long term as it actively reduces and manages flood risk within Croydon. The Strategy objectives support the objectives outlined in the SA both directly and indirectly as they aim to improve knowledge and understanding surrounding sustainable growth as well as focussing on the high-level management on local flood risk (Croydon, 2022).

Strategic Environmental Assessment (SEA)

The [SEA](#) is the process which identifies and evaluates social, environmental and economic objectives for the area in order to fulfil the requirements of the SEA (2001/42/EC) (SEA Directive). The SEA was used during the preparation of the Croydon 2015 strategy to evaluate options for achieving the flood risk objectives against wider sustainability objectives, and remains applicable for this strategy.

The sustainability objectives relevant to this strategy and determined by the SEA are listed below:

1. Protect and enhance human health and wellbeing
2. Raise awareness and understanding of local flooding and its dangers
3. Conserve and enhance biodiversity, wildlife corridors and habitats
4. Protect and enhance the water quality and hydromorphology of watercourses, WFD (Water Framework Directive) waterbodies and groundwater
5. Minimise the risk of flooding on existing and future key assets, infrastructure, homes and businesses

6. Manage and mitigate the future effects of climate change in new and existing development
7. Conserve and enhance the historic environment, heritage assets and their settings
8. Protect, conserve and enhance the quality, character and availability of open spaces and natural resources

The key findings of the SEA process are set out in the Environmental report for the previous Strategy. This outlines how the sustainability objectives and the identified measures are predicted to affect different environmental receptors. The SEA shows that Croydon Council's Strategy is expected to have a positive impact on the environment in both the short and long term as it actively reduces and manages flood risk within Croydon. The Strategy objectives successfully support the objectives outlined in the SEA both directly and indirectly as they aim to improve knowledge and understanding as well as focussing on the high-level management on local flood risk.

Measures

Measure 1: Establish the impact of planned growth on flooding hotspots/Critical Drainage Areas (CDA)

Croydon will update the existing or develop a new Surface Water Management Plan and review planning policies to establish the impact on planned growth. The LLFA will provide inputs to the planning application process to ensure that developments are steered away from areas identified as at high risk of flooding.

Measure 2: Identify how investments in flood resilience can minimise the local economic impacts of flooding, improve investor confidence and enable sustainable growth

A list of effective measures will be developed to identify alleviation methods in flooding hotspots and CDAs. This list will undergo a cost benefit analysis to produce a final list of alleviation methods which minimise the local economic impacts of flooding. A business case will be produced in order to raise the necessary funding.

Measure 3: Integrate long-term adaptive approaches into the spatial plans and growth strategies

To achieve this, Croydon will develop a list of long-term adaptive approaches whilst regularly reviewing spatial plans and growth strategies to ensure these approaches are included.

Measure 4: Delivering wider environmental objectives

Croydon will coordinate and monitor the actions included in objectives 1, 2 and 3 such as using Nature Based Solutions, identifying opportunities to achieve environmental net gain, and exploring options to reduce carbon footprint and environmental impact. This will ensure consistency and maximise the positive impact on the wider environment.

Objective 6

Be at the forefront of understanding current and future flood risk in Croydon, contributing to and applying UK research and innovation on better understanding and managing flood risk.

To remain resilient to the increasing flood risk exacerbated by the effects of climate change, we must push forward our research and innovation to create a better understanding of flood risk management. As an outcome of the previous strategy, resources have been used to improve SuDS awareness across the council and to roll out technical guidance based on this research. Ongoing training sessions also took place between 2016 and 2018 which was provided to council officers who also attended internal SuDS workshops.

This strategy aims to further develop our understanding of flood risk for the benefit of our residents, neighbouring boroughs and to help create a nation which are ready to respond and adapt to flooding change. With a developed understanding, Croydon can better support communities and businesses to be resilient and if affected by flood events, to get back on their feet swiftly. In line with the new [National Strategy](#), we want to take wider innovative actions that improve resilience to flooding such as those adopted by other local authorities throughout the UK.

Case study

In 2018, the London borough of Enfield funded a research project on evaluating the strategic long term financial benefit of retrofitting SuDS in London. The method used large-scale hydraulic modelling to provide evidence on the value of flood risk mitigation, therefore demonstrating the return-on investment across multiple beneficiaries such as residents and businesses. This project ultimately resulted in £750k of SuDS retrofit funding being secured, as well as demonstrating the feasibility of sustainable growth and innovation across London and the UK (Simon Ainley, 2018).

In 2017, Croydon LLFA conducted the Caterham Bourn Flood Alleviation Study which used computer modelling to develop flood alleviation options. They explored innovative ideas to integrate the groundwater model into the base model to maximise the accuracy of the results and a newsletter was produced to inform residents and businesses on the study's findings (Croydon, 2017). Initiatives such as these play a vital role in the effort to provide our residents and businesses with protection from flood risk whilst also protecting the environment.

Climate Change

Each year, climate change increases the likelihood of all types of flood risk. Our changing climate causes more intense and unpredictable weather patterns which put us at greater risk of flooding. The [UK Climate Projections 2018](#) predicts that by 2080, winter rainfall could increase by as much as 20%. This greater intensity of rainfall events increases the risks of all forms of flooding mentioned throughout this report as well as flash flooding (Met Office, 2018). This means there is a great need to discover and implement new sustainable solutions through research and innovation.

According to recent figures from the Environment Agency's [Climate Change Allowances Tool](#), Croydon LLFA should plan for an increase in peak rainfall amounts of 20% or greater and peak river flow increases of a minimum of 7% (Environment Agency, 2022).

Changes in climate can affect flood risk in many ways depending on the local conditions, topography and vulnerability. Increased rainfall will cause more surface runoff, therefore increasing localised flooding and erosion. As a result, there will be greater pressure on drainage and combined sewer systems.

Rising sea and river levels will increase flood risk due to the consequential increase in the water level of drains, sewers, and other connected watercourses. There is also an increased risk of groundwater flooding from limestone and chalk aquifers due to increased recharge during wetter winters.

Current emission rates means that climate change is inevitable to some degree. It is therefore essential that we plan ahead with the effects of climate change in mind. To adapt we must understand our current and future levels of vulnerability to flooding to ensure that resources are appropriately distributed. Regular updates, improvements and adherence to these plans is crucial to achieving long term sustainable flood resilience.

The [SFRA Good Practice Guide](#) provides information on how to ensure that developments are resilient to climate change whilst minimising the impact on its surroundings. To minimise flood risk, developments should be located in areas of low flood risk from all sources. Furthermore, the value of land which helps to manage flood risk should be respected, meaning, land, natural assets and infrastructure which contributes to flood risk management should be protected from development (Environment Agency, 2021). As outlined in [Local Plan](#) Policy DM25, developments that cannot be steered away from areas of high flood risk, developers must demonstrate the measures taken to mitigate the flood risk. The accompanying table in the [Local Plan](#) shows the various requirements to be completed for developments proposed in flood-risk areas (Croydon, 2021).

The National Planning Policy Framework states that developments should also support the transition to a low carbon future by reusing resources, converting existing buildings and encouraging renewables. Importantly, this guidance highlights the benefits of mixed-use developments, creating land for multiple uses such as recreation, habitat creation and carbon storage as well as flood risk mitigation. Section 10 of the NPPF states 'Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand' (Department for Levelling Up, Housing and Communities, 2021).

Measures

Measure 1: Upskilling and training for staff on new innovations surrounding flood risk management.

Croydon will identify training opportunities which promote innovation and ensure teams across the council are made aware. Teams will also be encouraged to share knowledge. Regular online research will be undertaken to identify new innovative ideas surrounding flood risk management.

Measure 2: Monitor future updates and guidance on flood risk about UK Climate Change projections, planning and development design and flood risk management good practice, communicate these across the Council's teams and ensure policies and practices take account of them.

Policies and practices will be regularly reviewed to ensure they are up to date and any updates will be discussed at the internal flood group meetings with a focus on innovation and sustainable growth. `

Objective 7

Collaborate with Risk Management Authorities in and around Croydon to jointly manage flood risk.

Signpost to Section 9 (4) requirements of The Act, this section deals with:

- a)) The risk management authorities in the authority's area and
- b) The flood and coastal erosion risk management functions that may be exercised by those authorities in relation to the area,

As mentioned in section 1.3, RMAs are responsible for cooperating and providing a coordinated operation to jointly manage flood risk. Appendix B shows the different RMAs operating within Croydon, their function, and their responsibilities.

RMAs are responsible for carrying the common themes featured throughout this report such as biodiversity gain and sustainable growth. [National Strategy](#) objective 1.4 states that RMAs will use nature-based solutions and improve the environment through their investments in flood resilience. Through collaboration, RMAs will work with catchment partnerships in adjacent boroughs to coordinate a catchment wide approach.

Working collaboratively helps to deliver practical and innovative solutions as well as improving resilience to floods and droughts. In addition, catchments can span over more councils and a catchment-based approach can promote a healthy blue green environment which benefits residents and wildlife.

Case study

Partnership Approach - Caterham Bourne Flood Alleviation Scheme – In April 2014, the Thames RFCC approved funding for a catchment wide investigation and flood alleviation scheme for the Caterham Bourne. The application was led by Croydon LLFA in partnership with Surrey County Council and Tandridge District Council. In September 2014, a consultant was procured to carry out the first stage catchment modelling and feasibility which will investigate surface water and groundwater mechanisms in the catchment. The catchment study informed the most appropriate forms of flood management in both Tandridge and Croydon for maximum benefit to local residents. Due to the complex nature of the Caterham Bourne and a requirement of the consultant to be innovative in its approach, the study had taken longer than anticipated but in March 2020, Stages 1 & 2 of the study were completed and options that could be taken forward to the Outline Business Case (OBC) are being considered in Stage 3. The study is programmed for completion in March 2023.

Croydon will further this collaborative approach by pursuing work with the London Drainage Engineers Group (LoDEG). LoDEG promote best practice across flood risk matters whilst nurturing effective working relationships between RMAs within the 33 London Councils.

Measures

Measure 1: Work with multi-agency partners to enhance local arrangements for flood planning and response.

Croydon LLFA will identify the RMAs in and around the borough and determine the roles and responsibilities of these RMAs. Collaborations will be pursued through LoDEG to develop ways of anticipating and managing flooding.

Measure 2: Continue to meet regularly and work with the other five South West London Boroughs.

To achieve this, Croydon will ensure any issues are resolved within the South-West London Partnership meetings. Opportunities for jointly addressing cross border flood management, technical knowledge sharing and jointly procuring services will be identified.

3 – Strategy Monitoring and Review

Signpost to Section 9 (4) requirements of The Act, this section deals with:

(h) how and when the strategy is to be reviewed,

The Act requires Croydon Council as the LLFA to specify how and when the Strategy will be reviewed. Croydon LLFA will monitor their progress against the action plan quarterly at the internal flood group meetings. The action plan is provided in Appendix C – Action Plan . This will include the Council team responsible for each action, funding allocation, priority, status and comments.

This Strategy provides a key tool to managing flood risk in Croydon over the next 5 years. The strategy is therefore due to be reviewed in 2028 as a minimum requirement under the Flood Risk Regulations 2009.

References

- [Caterham Bourne Flood Alleviation Study Update](#) (Croydon, 2017)
- [Caterham Bourne Flood Investigation](#) (Croydon Council, 2014)
- [Caterham Drive Flood Investigation Report](#) – 7th June 2016 (Croydon, 2017)
- [Croydon Climate Crisis Commission Report](#) (NEF, 2021)
- [Croydon Flood Investigation Report – 24th August 2015](#) (Croydon,2016)
- [Flood risk assessments: climate change allowances](#) (Environment Agency, 2022)
- [Flood Risk Information V1.0 October 2020](#) (Croydon Resilience Team, 2020)
- [Level 1 Strategic Flood Risk Assessment](#) (Croydon,2021)
- [Level 2 Strategic Flood Risk Assessment](#) (Croydon, 2021)
- [London Borough of Croydon Riparian Owner Leaflet](#) (Croydon, 2017)
- [London Borough of Croydon Flood Investigation Protocol](#) (Croydon, 2013)
- [Local Plan](#) (Croydon, 2021)
- [London Plan](#) (Greater London Authority, 2021)
- London Strategic SuDS Pilot Project (Simon Ainley,2018)
- [Merstham Bourne Flood Investigation S19](#) (Croydon, 2015)
- [National Planning Policy Framework](#) (Department for Levelling Up, Housing and Communities, 2021)
- [National Flood and Coastal Erosion Risk Management Strategy](#) (Environment Agency, 2020)
- [Sustainability Appraisal](#) (Croydon, 2022)
- [Strategic Environmental Appraisal](#) (Croydon, 2014)
- [Strategic Flood Risk Assessments Good Practice Guide](#) (Environment Agency, 2021)
- [UK Climate Projections \(UKCP\) - Met Office](#) (Met Office, 2018)

Appendix A – Legislative Context

Flood and Water Management Act 2010 – received Royal Assent on 8th April 2010. It gives local authorities responsibilities as Lead Local Flood Authorities (LLFA):

Part 1 of the act requires all Lead Local Flood Authorities in England to:

- Develop, maintain, apply, and monitor the application of, a strategy for local flood risk from surface run off, groundwater and ordinary watercourses, in their area. The strategy must at least set out who the risk management authorities are in the area and their relevant functions, the authority's objectives for managing flood risk, as well as proposed measures to deliver the objectives, and timescales for implementation of the measures; how those measures are to be paid for as well as their costs and benefits, how and when the strategy will be reviewed, and how the strategy contributes to the achievement of wider environmental objectives. The Lead Local Flood Authority must consult affected risk management authorities and the public about its strategy and provide guidance on the application of the strategy.
- Investigate flooding incidents in its area and report on its findings.
- Establish and maintain a register of structures or features which may significantly affect flood risk in their area including information regarding ownership and state of repair.
- Contribute to sustainable development in the discharge of its flood risk duties.
- Assume the power to designate features with respect to flood risk and subsequently to act as responsible authority for such features.

Part 2 of the act gives local authorities new duties as “approving bodies” with regard to drainage including:

- Approving rainwater drainage systems before commencement of any construction works which have drainage implications
- Adopting and maintaining approved systems which affect more than one property
- Approval of surface water drainage systems prior to connection to public sewers. (Automatic right of connection to public sewers is removed by this Act).

Part 3 of the act provides legislative powers for:

- Consolidation of legislation relating to flood risk including Water Industry Act 1991, the Water Resources Act 1991, the Land Drainage Act 1991, the Reservoirs Act 1975, the Highways Act 1980 (so far as relevant to water), the Environment Act 1995 (so far as relevant to water), the Public Health Act 1936 (so far as relevant to water) and the Coast Protection Act 1949.
- Provision of funding by Parliament to pay for expenditure under the Act

As Lead Local Flood Authority, the City Corporation is responsible for preparing and implementing a Local Flood Risk Management Strategy for the City. The Requirements of the Flood and Water Management Act with respect to this Local Flood Risk Management Strategy are set out in Table 1.

Local flood risk management strategies: England

- (1) A lead local flood authority for an area in England must develop, maintain, apply and monitor a strategy for local flood risk management in its area (a "local flood risk management strategy").
- (2) In subsection (1) "local flood risk" means flood risk from—
 - (a) surface runoff,
 - (b) groundwater, and
 - (c) ordinary watercourses.
- (3) In subsection (2)(c) the reference to an ordinary watercourse includes a reference to a lake, pond or other area of water which flows into an ordinary watercourse.
- (4) The strategy must specify—
 - (a) the risk management authorities in the authority's area,
 - (b) the flood and coastal erosion risk management functions that may be exercised by those authorities in relation to the area,
 - (c) the objectives for managing local flood risk (including any objectives included in the authority's flood risk management plan prepared in accordance with the Flood Risk Regulations 2009),
 - (d) the measures proposed to achieve those objectives,
 - (e) how and when the measures are expected to be implemented,
 - (f) the costs and benefits of those measures, and how they are to be paid for,
 - (g) the assessment of local flood risk for the purpose of the strategy,
 - (h) how and when the strategy is to be reviewed, and
 - (i) how the strategy contributes to the achievement of wider environmental objectives.
- (5) The strategy must be consistent with the national flood and coastal erosion risk management strategy for England under section 7.
- (6) A lead local flood authority must consult the following about its local flood risk management strategy—
 - (a) risk management authorities that may be affected by the strategy (including risk management authorities in Wales), and
 - (b) the public.
- (7) A lead local flood authority must publish a summary of its local flood risk management strategy (including guidance about the availability of relevant information).
- (8) A lead local flood authority may issue guidance about the application of the local flood risk management strategy in its area.
- (9) A lead local flood authority must have regard to any guidance issued by the Secretary of State about—
 - (a) the local flood risk management strategy, and
 - (b) guidance under subsection (8).

Figure 7: Requirements of the Flood and Water Management Act 2010 Section 9 Local flood risk management strategies: England

Appendix B – Responsibilities of RMAs and other organisations under The Act

Authority	Function	Responsibilities
Croydon Council	LLFA	<ul style="list-style-type: none"> • Strategic role in managing local flood risk sources (Surface water runoff, groundwater flooding and ordinary watercourses). • Maintain a register of flood defence structures and features which are likely to have significant effect on flood risk. • Investigate incidents of flooding and publish flood incident reports.
Croydon Council	Category 1 Responder	<ul style="list-style-type: none"> • Croydon Council is a Category 1 Responder under the Civil Contingencies Act 2004. • Responsible for ensuring that systems and processes are in place to provide emergency response to flooding. • The complex nature of flooding emergencies requires a widespread and prolonged response from multiple organisations; therefore, Croydon Council has created a Multi-Agency Flood Response Guidance document to allow all responding parties to collaborate on an effective coordinated response to severe flooding.
Croydon Council	Local Planning Authority	<ul style="list-style-type: none"> • Croydon Council has a responsibility to consider flood risk within strategic land use planning and the development of the Local Plan. • As the decision maker for flood risk for planning applications for development, Croydon Council must consider technical advice from other RMA's as consultees.
Croydon Council	Regulator of Ordinary Watercourses	<ul style="list-style-type: none"> • Under the Land Drainage Act 1991, any works (temporary or permanent) which may change or impact water within an ordinary watercourse will require consent from Croydon Council prior to any works being carried out. • Croydon Council have the power to notify riparian landowners along ordinary watercourses which require maintenance to reduce flooding and serve notice. • Croydon Council can serve notice on a person to rectify a nuisance related to an ordinary watercourse which is erected or altered without prior consent as required under Section 23 of the Land Drainage Act 1991.
Environment Agency	Strategic and operational role	<ul style="list-style-type: none"> • Provide strategic overview for managing all sources of flooding and coastal erosion. • Responsible for managing flood risk from main rivers and the sea.
Thames Water	Sewerage Undertaker	<ul style="list-style-type: none"> • Responsible for provision and maintenance of the sewer network to reduce the risk and impact of flooding and pollution.

		<ul style="list-style-type: none"> Responsible for the upgrade of sewer network to facilitate increased drainage capacity requirements. Responsible for surface water drainage from development via adopted sewers. <p>Since October 2011, water and sewerage companies are responsible for private sewers. These are sewers which were previously owned by the property owners. Despite this, not all private sewers were included. Further information regarding these exemptions may be found on the Thames Water website.</p>
Transport for London	Transport infrastructure provider	<ul style="list-style-type: none"> Duty to maintain its highways under the Highways Act 1980. This includes responsibility for drains, kerbs, road gullies, ditches and the pipe network which connects to the sewers.

In addition to RMAs, the local community and businesses have an important role in managing the local flood risk.

Authority	Function	Responsibilities
Residents	Property and riparian owners	<ul style="list-style-type: none"> Responsible for flood resistance and resilience associated with properties. Responsible for emergency and contingency planning associated with properties. Responsible for protecting their property from flooding. Riparian owners are responsible for maintaining flood defences on their property. Riparian owners are responsible for maintaining the flow of water in watercourses on their property. <p>Practical guidance for individuals to ensure their home is protected from flooding can be found on the Environment Agency website here (link).</p>
Businesses	Property owners	<ul style="list-style-type: none"> Responsible for ensuring that their activities do not lead to the obstruction of drains or watercourses. Responsible for ensuring waste is correctly stored and disposed of.
Infrastructure Providers	Developers	<ul style="list-style-type: none"> Responsible for considering how their assets and land may impact surrounding flood risk. Must work with Croydon Council to identify multiple benefits of works and maximise added value. Must prioritise sustainable drainage techniques and water conscious urban design.

Appendix C – Action Plan

Signpost to Section 9 (4) requirements of The Act, this section deals with:

(e) how and when the measures are expected to be implemented

Appendix D- List of Acronyms

AEP – Annual Exceedance Probability

CDA – Critical Drainage Areas

CIL – Community Infrastructure Levy

CRF – Community Resilience Forum

FCERM – Flood and Coastal Erosion Risk Management

GiA – Grant in Aid

LLFA – Lead Local Flood Authority

LFRMS – Local Flood Risk Management Strategy

LPA – Local Planning Authority

LoDEG – London Drainage Engineers Group

RoFSW – Risk of Flooding from Surface Water

RMA – Risk Management Authority

SA – Sustainability Assessment

SEA – Strategic Environmental Assessment

SES – Sutton and East Surrey

SuDS – Sustainable Urban Drainage System

SWMP – Surface Water Management Plan

TfL – Transport for London

WFD – Water Framework Directive

Appendix E – Croydon flood risk maps

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OBJECTIVE	MEASURE	ACTIONS	LEAD		
1	Identify investment and funding opportunities to develop and deliver a programme of flood alleviation schemes which will take forward innovative actions that help to bolster resilience to flooding and climate change.	1 Continue to improve the borough-wide understanding of current and future flood risk, including the likelihood and consequences, and inform the prioritisation of flood alleviation schemes	1 Review/update the Surface Water Management Plan using new data Highways		
		2 Review/update the Strategic Flood Risk Assessment Level 1 & Spatial Planning			
		3 Continue to undertake flood alleviation studies where relevant, to better understand the flooding mechanism Highways			
		4 Develop a list of flood alleviation schemes of differing scales using the understanding of current and future flood risk Highways			
		2 Develop a funding strategy which identifies investment and funding opportunities to develop and deliver a programme of flood alleviation schemes	1 Monitor funding streams available for flood alleviation measures Highways		
		2 Develop a list of funding streams, types of applications required and dates for submission of applications Highways			
		3 Prepare/submit a business case to Finance for capital funding to implement small interventions Highways			
		4 Support the Infrastructure Delivery Plan by providing progress on various schemes that involve S106 and CIL money Highways + Spatial Planning			
		3 Identify opportunities to achieve environmental net gain through de-culverting, natural catchment management and other measures	1 Generate list of potential locations for de-culverting Highways + Parks		
		2 Assess the potential for multiple benefits of de-culverting in identified locations Highways + Parks			
		4 Explore options to reduce carbon footprint and environmental impact in the design, building and maintenance of flood alleviation schemes	1 Attend the EA carbon calculator and reporting training All Croydon Teams		
		2 Always consider carbon footprint and environmental impact during all stages of a scheme All Croydon Teams			
		3 Understand the council's aspirations with regards to carbon reduction All Croydon Teams			
		5 Identify innovative solutions that help to bolster resilience to flooding and climate change	1 Investigate innovative solutions that help to bolster resilience to flooding and climate change Highways		
		2 Collate a list of innovative solutions to help with resilience to flooding and climate change Highways			
		6 Investigate benefits and costs of different resilience actions and property level protections that could be effective in Croydon	1 Collate a list of different resilience actions and property level protections that could be effective in Croydon Highways		
		2 Investigate the benefits and costs of the different resilience actions and property level protections Highways			
		3 Raise awareness of the different resilience actions and property level protections Highways + Development Management			
		4 Undertake trial of the different resilience actions and property level protections to demonstrate their benefits, effectiveness, and costs Highways			
		2	New development and regulated activities will contribute to making places more resilient to flooding using Nature Based Solutions where possible and achieving environmental net gain, today and in the future.	1 Ensure appropriate guidance for developers is available to make places more resilient, use Nature Based Solutions, achieve environmental net gain and promoting retrofitting SuDS.	1 Review/update the Advice to Planning Applicants for proposed major developments Highways
				2 Review/update the Standing Advice used by the LPA for assessing proposed minor developments Highways	
				3 Investigate and collate a list of nature-based solutions that could be effective in Croydon Highways	
				4 Develop a guidance on the costs of installing and maintaining different types of SuDS Highways	
				5 Identify ways to increase awareness of SuDS and promote retrofitting of SuDS Highways	
6 Ensure that all the information related to water/wastewater management plan is available online e.g.: -Surface water management plan – final report Highways + Development Management					
7 Ensure that the borough's flood risk information needed for sequential tests is readily accessible online Highways + Development Management					
2 Continue to monitor the risk of individual and cumulative flood risk to and from developments and review ways to facilitate more sustainable design and post-construction changes.	1 Continue to monitor the risk of individual and cumulative flood risk to and from developments Highways + Development Management				
2 Identify ways to increase awareness of the flood risk to owners of developments Highways + Development Management					
3 Improve understanding of the flood risk to and from developments, to inform necessary changes to policy/guidance documents Highways + Development Management + Spatial Planning					
4 Explore ways to facilitate more sustainable design and post-construction changes Highways					
3 Ensure the technical review of SuDS applications including the use of Nature Based Solutions as part of the LLFA Statutory Consultee Role for planning applications.	1 Quantify the resource time needed to assess drainage strategies/FRAs submitted as part of planning applications Highways				
2 Provide training needed to assess drainage strategies/FRAs submitted as part of planning applications Highways + Development Management					

				3	Review employment or procurement needed to successfully deliver the LLFA Statutory Consultee role	Highways
		4	Monitor and record planning application against SuDS Hierarchy to ensure that nature-based solutions are prioritised.	1	Develop a tracking system to monitor number of applications (major & minor), types, date received, date responded, type of response etc	Highways
		5	Continuous working with the Environment Agency, other partners, and other bodies (such as Association of Directors of Environment Economy Planning & Transport, Town and Country Planning Association and the Royal Town Planning Institute) to develop the planning skills and capabilities.			
		6	Identify and promote development-related funding mechanisms to support the delivery of flood alleviation schemes.	1	Collate a list of potential developments to seek for funding	Highways + Development Management
				2	Explore how S106 agreement funding can be utilised to deliver flood alleviation schemes	Highways + Development Management
3	Develop and implement best practice for recording, inspecting and managing flood assets, considering the changing environment	1	Invest in developing and improving in-house information management to enable knowledge sharing between the different teams and externally	1	Create an inventory of the asset information held by the council and the format	Highways
				2	Collate all assets into a single system i.e. Confirm OnDemand	Highways + ICT
				3	Map all flood assets including ordinary watercourses in the corporate GIS system	Highways + ICT
				4	Develop a system for the Contact Centre/Technical Support to better record the different types of flooding	Highways
				5	Ensure that the most up-to-date flood maps/data are available or accessible to all users	Highways
				6	Provide inputs for producing the Strategic Flood Risk Assessment that supports the local plan	Spatial Planning
				7	Improve inter-team collaboration for communicating flood issues in the borough with the residents	Highways + Spatial Planning + Emergency Planning
		2	Raise profile and understanding of groundwater as a flood risk	1	Ensure emergency planning procedures consider response to groundwater events	Emergency Planning
				2	Develop a strategy for groundwater management within the borough	Highways
				3	Carry out detailed study of groundwater presence and flood mechanisms in Croydon	Highways
				4	Sign up to receive groundwater information from the Environment Agency especially, in relation to the Caterham Bourne	Highways + Development Management
				5	Improve groundwater information on the council website and develop a leaflet/flyer for residents/businesses	Highways
				6	Explore the possibility of installing monitoring boreholes in areas susceptible to severe groundwater flooding within the borough	Highways
				7	Engage with SES Water to provide borehole data from Kenley Water Treatment Works	Highways
		3	Collate and develop guidance on costs of installing and maintaining different SuDS types	1	Raise aware of the SuDS Design and Evaluation Guide on the council website	Highways + Development Management
				2	Identify and compile a list of SuDS systems that are suitable for implementation in Croydon	Highways
				3	Develop guidance on the costs of installing and maintaining different types of SuDS	Highways
				4	Provide regular training about SuDS systems and its benefits -	Highways
				5	Promote the use SuDS systems within schemes implemented by the council i.e. highways, parks, public realm, housing etc	All Croydon Teams
		4	Develop a programme to assess the effectiveness and working conditions of all the Council's existing drainage infrastructure, and put in place a robust maintenance/renewal programme that will ensure that the risk of flooding is reduced	1	Review/improve existing cyclical gully cleansing programme, targeting most silted and hotspot areas	Highways
				2	Develop a Confined Space Programme to target drainage assets in flood hotspot	Highways
				3	Develop a maintenance programme for the linear drainage assets in the borough	Highways
				4	Develop a maintenance programme for the footpath gullies in the borough	Highways
				5	Continue to review/improve the gully repairs programme	Highways
				6	Explore the possibilities of installing silt/water level monitoring sensors in hotspots	Highways
				7	Review and work with the supplier of the gully management system to make improvements where necessary	Highways
				8	Develop a programme to replace damaged linear drainage systems with a robust product	Highways
	5	Investigate flood events to understand their source and impacts and apply the learning to inform the Council's and other RMA's flood management procedures	1	Review/update the existing flood investigation protocol	Highways	
			2	Continue to prepare Section 19 flood investigation reports where appropriate	Highways	
			3	Continue to update the flood incident register with new information	Highways	

				4	Share lessons learnt with relevant teams in the council and other RMAs	Highways + Emergency Planning		
4	We will communicate effectively with infrastructure owners, businesses, and the community to ensure they understand the potential impact of flooding on their lives and livelihoods. They will therefore be better prepared to respond to flooding and will take action to make their properties more resilient to flooding and climate change.	1	Review effectiveness of emergency procedures and ensure our capabilities are known throughout the council and our commissioned services	1	Review existing emergency procedures and identify actions to take forward	Emergency Planning		
				2	Circulate copy of the emergency procedures to relevant teams within the council	Emergency Planning		
				3	Review and update emergency procedures on the council	Emergency Planning		
		2	Regularly liaise with Network Rail, Thames Water and other infrastructure owners to discuss areas where their infrastructure falls in Croydon's flood hotspots			1	Engage with Network Rail regarding planned maintenance to their assets within the Caterham Bourne and Merstham Bourne catchments	Highways
						2	Engage with Network Rail and Thames Water with regards to finding a solution to the surface water flooding at Station Approach, Purley Oaks Road	Highways
						3	Engage with Thames Water and TfL to determine whether the sewer condition or affiliated assets are influencing flood risk in Purley Cross	Highways
						4	Engage with Thames Water with regards to agreeing ownership of the soakaway assets in the New Addington area	Highways
						5	Engage with Thames Water with regards to finding a solution for the foul sewer flooding on Kent Gate Way	Highways
						6	Engage with Thames Water regarding planned maintenance/upgrade to their surface water sewer network in hotspots/CDAs	Highways
						7	Engage with Thames Water regarding their DWMP Programme	Highways
						8	Identify/collate other problem areas within the borough relating to the assets of Network Rail and Thames Water	Highways
						9	Invite representatives of Network Rail and Thames Water to the internal flood group meetings	Highways
		3	Engaging with the public and improving digital communication to encourage resident led initiatives and provide an efficient warning system			1	Continue to attend flood action group/residents' association meetings	Highways
						2	Expand the information available on the council website	Highways + Development Management + Emergency Planning
						3	Encourage residents/businesses to sign up to the EA flood warning service	Highways + Emergency Planning
						4	Explore opportunities to make outputs from Datasphere & Hydromaster available to residents/businesses	Highways
						5	Promote available advice and guidance documents e.g. Thames Water, Environment Agency, Water UK etc	Highways
						6	Compile a list of flood alleviation initiatives that residents/businesses could implement privately or community wide	Highways
		4	Identify riparian owners and raise awareness of their responsibilities			1	Undertake regular surveys of watercourses to identify riparian owners	Highways
						2	Engage with owners of properties near watercourses to ensure they understand their maintenance responsibilities	Highways
						3	Undertake regular inspections to ensure that maintenance of the channels, trash screens and other related assets are being carried out	Highways
						4	Ensure adequate information about riparian owner responsibilities are available on the council website	Highways
						5	Promote riparian owner responsibilities at flood action group/residents' association meetings	Highways
		5	Develop flood plans that better coordinate preparing and responding to incidents			1	Liaise with the Emergency Resilience Team to develop flood plans	Highways + Emergency Planning
						2	Undertake regular reviews of the flood plans to ensure they are fit for purpose	Emergency Planning
3	Undertake regular drills to test the flood plans and update as necessary					Emergency Planning		
5	Enable sustainable growth by taking account of social, economic, environmental and flood risk opportunities and challenges	1	Establish the impact of planned growth on flooding hotspots/CDAs	1	Update the existing or develop a new Surface Water Management Plan (SWMP)	Highways		
				2	Review planning policies to understand where growths are planned within the borough	Highways + Development Management		
				3	Work with the LPA to ensure that new developments are steered away from areas identified as high risk of flooding	Highways + Development Management		
		2	Identify how investments in flood resilience can minimise the local economic impacts of flooding, improve investor confidence and enable sustainable growth			1	Develop a list of potential measures that could be implemented to alleviate flooding in hotspots/CDAs	Highways
						2	Undertake cost benefit analysis of the measures	Highways

				3	Develop a list of flood alleviation measures that have been identified could minimise the local economic impacts of flooding	Highways
				4	Develop a business case for funding (both internal & external)	Highways
		3	Integrate long-term adaptive approaches into the spatial plans and growth strategies	1	Identify and develop a list of long-term adaptive approaches	Highways + Spatial Planning
				2	Regularly review spatial plans and growth strategies to ensure long-term adaptive approaches are included	Spatial Planning
		4	Delivering wider environmental objectives			
6	Be at the forefront of understanding current and future flood risk in Croydon, contributing to and applying UK research and innovation on better understanding and managing flood risk	1	Upskilling and training for staff on new innovations surrounding flood risk management	1	Identify training opportunities available (internal & external) and ensure teams across the council are made aware	All Croydon Teams
				2	Encourage knowledge sharing in teams across the council	All Croydon Teams
				3	Undertake regular online research to identify new innovative ideas surrounding flood risk management	Highways
		2	Monitor future updates and guidance on flood risk about UK Climate Change projections, planning and development design and flood risk management good practice, communicate these across the Council's teams and ensure policies and practices take account of them	1	Discuss any updates and guidance at the internal flood group meetings	All Croydon Teams
				2	Regularly review policies and practices to ensure these contain the most up-to-date information available	All Croydon Teams
				3	Develop a list of the policies and practices that should be regularly reviewed and identify the appropriate period for review	All Croydon Teams
7	Collaborate with Risk Management Authorities in and around Croydon to jointly manage flood risk.	1	Work with multi-agency partners to enhance local arrangements for flood planning and response	1	Identify the Risk Management Authorities with interest in and around Croydon	Highways
				2	Identify the roles and responsibilities of the Risk Management Authorities	Highways
				3	Pursue collaborations through LoDEG to develop ways of anticipating and managing flooding in London	Highways
				4	Organise a catchment wide working group for planning and research purposes	Development Management
				5	Continue to meet with groups (RFCC)	Highways
		2	Continue to meet regularly and work with the other five South West London Boroughs	1	Ensure Croydon's issues are resolved within the South-West London Partnership meetings	Highways
				2	Identify opportunities to jointly address cross border flood management	Highways
				3	Identify technical knowledge sharing opportunities	Highways
				4	Identify opportunities where services can be jointly procured	Highways

Local Flood Risk Management Strategy – Public Consultation

Context / Statutory Responsibilities

Flood and Water Management Act 2010

- Croydon Council defined as a Lead Local Flood Authority (LLFA) under the Act
- Responsible for managing risk of flooding from surface water, groundwater and ordinary watercourses
- Maintain a register of assets
- Investigate significant flood events
- Statutory consultee on major development regarding drainage
- Consent works impacting ordinary watercourses
- Co-operate with other risk management authorities

Local Flood Risk Management Strategy

- Another duty of the LLFA is to prepare a Local Flood Risk Management Strategy
- Duty to consult the public on the Strategy
- Strategy focuses on the management of local flood risk
- Must align with national strategy but consider local issues
- Identifies objectives, measures and actions
- Monitoring of action plan will take place at quarterly flood group meetings

Current Strategy / Action plan

- Current Strategy adopted by the Council in December 2015 and is on our [website](#)
- Act recommends the strategy is reviewed every 6 years
- The current Strategy has [8 objectives](#) and [92 actions](#)
- Some of the main actions points of the strategy included:
 - continued engagement with Thames Water,
 - cooperation and sharing data and resources with other boroughs, etc.

Strategy Expectations

- Strategy aims to reduce the risk and impact of flooding
- Draft strategy has 7 objectives and around 117 actions
- Builds on changes to Environmental and Planning guidance
- Builds on the work from the previous strategy

Updating the Strategy 2023-2028

- Draft Strategy developed for the period 2023-2028
- [Consultation](#) with residents/ businesses and partners currently taking place – ends 3 August 2023
- Our Comms team are supporting us with engaging our stakeholders

Public Consultation

- Working with the communications team to engage our residents, businesses, and other stakeholders
- Consultation published via Get Involved Croydon
- Residents will have their say on Council's plan to manage flood risk
- Targeted engagement with those at higher risk of flooding
- Comms team are promoting the consultation through multiple channels
- Promotion will continue throughout the 6-week consultation period
- Feedback will be analysed before finalising the Strategy

Next steps

- Consultation ongoing and planned to end 3rd Aug 2023
- Assessing feedback - Aug 2023
- Finalise draft Strategy – Aug/ Sept 2023
- Presented strategy to Cabinet - Dec 2023
- Publish the final Strategy on our website – Dec 2023/
Jan 2024

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LONDON BOROUGH OF CROYDON

REPORT:	Streets & Environment Sub-Committee
DATE	11 July 2023
REPORT TITLE:	Scrutiny Stage 2 Responses to Recommendations arising from: Streets & Environment Sub-Committee on 4 October 2022, 8 November 2022 & 31 January 2023.
LEAD OFFICER:	Tom Downs, Democratic Service and Governance Officer- Scrutiny T:020 8726 6000 x 63779
ORIGIN OF ITEM:	The Cabinet response to recommendations made by Streets & Environment Sub-Committee is provided for the Sub-Committee's information.
BRIEF FOR THE COMMITTEE:	The Streets & Environment Sub-Committee is asked to note the response given by the Cabinet to recommendations made by the Committee and consider whether any further action is necessary.
PUBLIC/EXEMPT:	Public

1 SUMMARY

- 1.1** The rights of scrutiny to make recommendations to the Cabinet, Council, non-Executive Committee, Partner Agency or Partnership Board is set out in Section 8 of Part 4E – Scrutiny and Overview Procedure Rules of the Council's Constitution.
- 1.2** When making a recommendation to the Cabinet, a response needs to be given within two months to confirm whether the recommendation has been accepted or not. If accepted, this response should include how the recommendation will be implemented.
- 1.3** To ensure the Committee can monitor the response given to its recommendations, this report will be included as a standing item on each agenda, setting out in Appendix A the response from the Cabinet to the recommendations of the Committee.
- 1.4** The Committee is asked to review the responses given and consider whether any further action is necessary.

2 RECOMMENDATIONS

The Sub-Committee is asked to:

- 2.1 Note the responses given and consider whether any further action is necessary.

3 SCRUTINY RECOMMENDATIONS

- 3.1 The Scrutiny recommendations are contained in the schedule in the appendix to this report.
- 3.2 The detailed responses, including reasons for rejected recommendations and action plans for the implementation of agreed recommendations are also contained in the appendix.

4 APPENDICES

- 4.1 Appendix 1: Scrutiny Stage 2 Response - Healthy Streets and Active Travel
Appendix 2: Scrutiny Stage 2 Response - Waste Contract Performance Paper
Appendix 3: Scrutiny Stage 2 Response - Waste Collection and Street Cleansing Contract
Appendix 4: Scrutiny Stage 2 Response – Budget Scrutiny Challenge

5 BACKGROUND DOCUMENTS

- 5.1 Report to Streets & Environment Sub-Committee on 4 October 2022
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=170&MId=3429&Ver=4>
- 5.2 Report to Streets & Environment Sub-Committee on 8 November 2022
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=170&MId=3439&Ver=4>
- 5.3 Report to Streets & Environment Sub-Committee on 8 November 2022
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=170&MId=2946>
- 5.4 Report to Cabinet on 22nd March 2023
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=183&MId=2991&Ver=4>
- 5.5 Report to Cabinet on 24nd May 2023
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=183&MId=3571&Ver=4>

Appendix 1 – Item: Healthy Streets and Active Travel

Considered by Streets & Environment Sub-Committee on 4 October 2022

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
1.	The Sub-Committee recommended that key stakeholders were identified and engaged before the implementation of any new Healthy Neighbourhood schemes.	Councilor Scott Roche SCRER	Accepted	Steve Iles, Director of Sustainable Communities/ Heather Cheesbrough, Director of Planning & Sustainable Regeneration	Included in 2023/24 funding request to be submitted to TfL	Key partners to be identified and engaged with prior to implementation of any new schemes and prior to December 2023. Engagement should continue through the operation of any Experimental schemes	Feb 2024
Page 119 2.	The Sub-Committee recommended that the Council look at developing a cohesive Active Travel policy that brought all these schemes together in a coherent and strategic way that provided a narrative that residents could easily understand.	Councilor Scott Roche SCRER	Partially Accepted (See Financial Implications)	Steve Iles, Director of Sustainable Communities/ Heather Cheesbrough, Director of Planning & Sustainable Regeneration	Not part of the Funding submission to TfL considered by Mayor in Cabinet in January. TfL very unlikely to fund development of such a policy.	Whilst a critical piece of work, it is currently unclear how it would be financed and hence resourced. Officers to consider project scope, cost and how in might be financed	2024
3.	The Sub-Committee recommended that there needed to be better communications with residents about the outcomes of Healthy Neighbourhood and School Street schemes that were in their localities.	Councilor Scott Roche SCRER	Accepted	Steve Iles, Director of Sustainable Communities/ Heather Cheesbrough, Director of Planning & Sustainable Regeneration	Included in 2023/24 funding request to be submitted to TfL	Ongoing as part of the current experimental HNs and as part of the development and engagement re' any future HNs Outcomes of experimental School Streets which recommenced on 25 th April 2022.to be reported back	Sept 2023 July 2023

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
4.	The Sub-Committee recommended that the Council investigate developing a Kerbside Strategy to work in an integrated way alongside the Walking and Cycling Strategies.	Councilor Scott Roche SCRER	Rejected as already in progress Issues relating to kerbside strategy will be picked up as part of the Parking Policy Review that is already in progress.	Steve Iles, Director of Sustainable Communities/ Heather Cheesbrough, Director of Planning & Sustainable Regeneration	£200,000 Transformation funding agreed for parking policy review	Incorporated into the Parking Policy Transformation project	TBC
5.	The Sub-Committee recommended that the Council investigate attracting an e-bike hire scheme into the borough, possibly through Section 106 funding.	Councilor Scott Roche SCRER	Rejected The Council previously attracted the Lime Bikes e-bike hire scheme into the Borough. The operator was in Croydon for only a relatively short period before withdrawing. In the light of that trial, seeking to attract another operator, is not considered a priority use of very scarce resources, at least in the short term, but still open-minded and talking to organisations.	Steve Iles, Director of Sustainable Communities/ Heather Cheesbrough, Director of Planning & Sustainable Regeneration	N/A	N/A	TBC

Appendix 2 – Item: Waste Contract Performance Paper

Considered by Streets & Environment Sub-Committee on 8 November 2022

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
1.	The Sub-Committee were of the view that improvements to communications with residents needed to be a priority and should include updating the website and an explanation of street grading.	Councilor Scott Roche SCRER	Accepted	Steve Iles, Director of Sustainable Communities	None	April 2024	TBC
2.	The Sub-Committee recommended that communication with residents who had submitted reports on the 'Love Clean Streets' app needed to be improved to notify them on the resolution of the report.	Councilor Scott Roche SCRER	Rejected as already in progress The LCS App already provides two-way communication for environmental reports such as street cleansing, street bins Flytip and graffiti reports. As a principle when other areas are added to the APP the two-way communication is developed.	Steve Iles, Director of Sustainable Communities	None	N/A	TBC
3.	The Sub-Committee recommended that Veolia and the Council work with Friends and Residents groups to analyse and help to resolve issues with repeat missed collections. Members recommended that this is achieved through mapping areas of repeated missed bin collections, especially in relation to access issues, particularly with communal recycling bins.	Councilor Scott Roche SCRER	Rejected as already in progress The Mayor and Cabinet Member for Streets and Environment have, and will continue, regular communication with the contractor and resident groups to discuss and understand the issues.	Steve Iles, Director of Sustainable Communities	None	N/A	TBC
4.	The Sub-Committee were of the view that the option to 'raise an enquiry' needed to be more prominent on the Council website when residents were trying to submit a missed collection report	Councilor Scott Roche SCRER	Rejected as already in progress The Council has already been reviewing the online reporting processes for missed bins which includes the ability to raise enquiries.	Steve Iles, Director of Sustainable Communities	None	N/A	TBC

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
	following 48 hours of the intended collection date, or when making a report was otherwise unavailable.						
5.	The Sub-Committee requested that the Cabinet Member for Streets and Environment provided a full update on his data gathering and plans for reducing fly tipping in Croydon.	Councilor Scott Roche SCRER	Accepted	Steve Iles, Director of Sustainable Communities	Yes – to be contained within existing budgets but at this stage costs are not yet quantified.	September 2023	TBC

Appendix 3 – Item: Cabinet Report - Waste Collection and Street Cleansing Contract

Considered by Streets & Environment Sub-Committee on 8 November 2022

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
1.	The Sub-Committee recommended that a Cross-Party working group be established to input into the development of any new Service Delivery Options for Waste Collection and Street Cleansing.	Councilor Scott Roche SCRER	Rejected as already in progress All Member briefings will take place rather than a cross party working group	Steve Iles, Director of Sustainable Communities	None	February 2023	TBC

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Appendix 4 – Item: Cabinet Report - Budget Scrutiny Challenge

Considered by Streets & Environment Sub-Committee on 31 January 2023

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
Page 125	1. The Sub-Committee recommended that recruitment and retention formed a key workstream in the transformation work taking place in Building Control and the Planning Service , as it was felt this would be key to ensuring this could be delivered with sufficient capacity to also successfully engage with residents and stakeholders.	Councillors Jeet Bains SCRER	Accepted There is a 'workforce' workstream as part of the Planning Transformation Programme and therefore recruitment and retention are considered.	Nick Hibberd, Corporate Director of SCRER	Market Factor Supplement is additional cost to be found within existing budgets.	TBC	TBC
	2. The Sub-Committee recommended that recruitment and retention formed a key workstream in the transformation work taking place in Parking Services , as it was felt this would be key to ensuring this could be delivered with sufficient capacity to also successfully engage with residents and stakeholders.	Councillors Scott Roche SCRER	Rejected The Parking Policy review is a review of the Borough's parking policy and does not have a workstream on recruitment and retention; therefore, this recommendation is not accepted.	Nick Hibberd, Corporate Director of SCRER	N/A	TBC	TBC

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LONDON BOROUGH OF CROYDON

REPORT:	Streets & Environment Sub-Committee
DATE	11 July 2023
REPORT TITLE:	WORK PROGRAMME 2023-24
LEAD OFFICER:	Tom Downs, Democratic Service and Governance Officer- Scrutiny T:020 8726 6000 x 63779
ORIGIN OF ITEM:	The Work Programme is scheduled for consideration at every ordinary meeting of the Streets & Environment Scrutiny Sub-Committee.
BRIEF FOR THE COMMITTEE:	To consider any additions, amendments, or changes to the draft work programme for the Sub-Committee in 2023/24.
PUBLIC/EXEMPT:	Public

1 SUMMARY

- 1.1 This agenda item details the Sub-Committee's draft work programme for the 2023/24 municipal year.
- 1.2 The Sub-Committee has the opportunity to discuss any amendments or additions that it wishes to make to the work programme.
- 1.3 The Sub-Committee is able to propose changes to its work programme, but in line with Constitution, the final decision on any changes to any of the Committee/Sub-Committee work programmes rests with the Chairs & Vice-Chairs Group, following consultation with officers.

2 RECOMMENDATIONS

The Sub-Committee is asked to:

- 2.1 Note the draft work programme for 2023-24, as set out in Appendix 1 of the report.
- 2.2 Consider whether there are any changes to the work programme that should be considered.

3 WORK PROGRAMME

3.1 The work programme

The proposed work programme is attached at **Appendix 1**.

Members are asked to note that the lines of enquiry for some items have yet to be confirmed and that there are opportunities to add further items to the work programme.

3.2 Additional Scrutiny Topics

Members of the Sub-Committee are invited to suggest any other items that they consider appropriate for the Work Programme. However, due to the time limitations at Sub-Committee meetings, it is suggested that no proposed agenda contain more than two items of substantive business in order to allow effective scrutiny of items already listed.

3.3 Participation in Scrutiny

Members of the Sub-Committee are also requested to give consideration to any persons that it wishes to attend future meetings to assist in the consideration of agenda items. This may include Cabinet Members, Council or other public agency officers or representatives of relevant communities.

4 APPENDICES

- 4.1** Appendix 1: Draft Work Programme 2023/24 for the Streets & Environment Scrutiny Sub-Committee.

5 BACKGROUND DOCUMENTS

- 5.1** None

Streets & Environment

The below table sets out the working version of the Streets & Environment Sub-Committee work programme.

Meeting Date	Item	Scope	Directorate & Lead Officer
11 July 2023	Pre-Decision: Parking Policy Transformation Project	To conduct pre-decision scrutiny on the upcoming Cabinet report covering the Parking Policy Transformation Project.	Sustainable Communities Regeneration & Economic Recovery Steve Iles
	Consultation on the Local Flood Risk Management Strategy	To receive a presentation on the forthcoming consultation on updating the Council's Flood Risk Plan, so that the Sub-Committee can provide feedback and input into its development.	Sustainable Communities Regeneration & Economic Recovery Nick Hibberd

10 October 2023	POSSIBLE - Air Quality Action Plan 2023-2028	To scrutinise the Council's Air Quality Action Plan 2023-2028.	Sustainable Communities Regeneration & Economic Recovery Nick Hibberd
	POSSIBLE - CIL charging schedule adoption	To review and provide feedback on the new CIL charging schedule adoption.	Sustainable Communities Regeneration & Economic Recovery Steve Dennington
	POSSIBLE - Graffiti Removal Team	To receive an update on the establishment of the Graffiti Removal Team, the work undertaken and any associated KPIs.	Sustainable Communities Regeneration & Economic Recovery Steve Iles
	POSSIBLE - Planning obligations SPD adoption	To provide feedback on the Cabinet report concerning the adoption of the Planning Obligations SPD.	Sustainable Communities Regeneration & Economic Recovery Heather Cheesbrough
30 January 2023	Budget Scrutiny Challenge	The Sub-Committee is asked to review the information provided on three budget proposals (to be identified) and reach a conclusion on the following:- 1. Are the savings deliverable, sustainable and not an unacceptable risk.	Sustainable Communities Regeneration & Economic Recovery

		<p>2. Is the impact on service users and the wider community understood.</p> <p>3. Have all reasonable alternative options been explored and do no better options exist.</p>	Nick Hibberd
	POSSIBLE – Climate Action Plan and Habitat Action Plan	To review and provide feedback on the Council's Climate Action Plan and Habitat Action Plan.	<p>Sustainable Communities Regeneration & Economic Recovery</p> <p>Steve Iles</p>
2 April 2023	Local Plan Review	To scrutinise the review of the Local Plan 2023/24	<p>Sustainable Communities Regeneration & Economic Recovery</p> <p>Heather Cheesbrough</p>
	Planning Transformation	For the Sub-Committee to receive an update on the Transformation projects taking place in the Planning Department.	<p>Sustainable Communities Regeneration & Economic Recovery</p> <p>Heather Cheesbrough</p>
	POSSIBLE - Waste contract procurement award- May 2024	To scrutinise the Waste contract procurement award.	<p>Sustainable Communities Regeneration & Economic Recovery</p> <p>Steve Iles</p>

Standing Items:

Work Programme Item	Notes
Financial Monitoring for SCRER	Standing Item tracking progress with the delivery of 2023/24 Budget using the latest Cabinet Financial Performance report (To review by exception).

Items of Interest

The following items haven't been scheduled into the work programme but are highlighted as potential items of interest to be scheduled during the year ahead.

Unallocated Items	Scrutiny Officer Notes
Environment Bill Responsibilities	To review the additional responsibilities that will fall upon the Council following the adoption of the Environment Bill
Biodiversity Strategy	To review the upcoming Biodiversity Strategy once written.
Implications of the Levelling Up and Regeneration Bill	To review the possible implications of the Levelling Up and Regeneration Bill
Review of the Waste Contract	To review the progress on the review of the Waste Contract.
Environmental Enforcement	To review the Environmental Enforcement service.
Protection of green spaces and parks	To look at the protection of parks and green spaces in the borough, including the support fund and Council strategy.
Clean Water and Sewage (Thames Water)	To look at the water quality in the borough and the risks of contamination from sewerage.

Transport, Active Transport & School Streets	To look at the strategy for Transport, Active Transport, Healthy Streets & School Streets in the borough, alongside Road Fatalities & Speed Limits
Transformation of Independent Travel	To review the transformation of the Independent Travel Service – End of 2023/24

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